# Blockchain Guide for Law Enforcement

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Since its inception, Blockchain has worked closely with law enforcement to support investigation, interdiction and prevention of financial crime. This guide explains how Blockchain products and services work, its legal entities, as well as how to most effectively make requests for information.

Users of Blockchain's self-custodied wallet face <u>Blockchain Luxembourg S.A.</u>, a Luxembourg company whose primary business is the publication of open source downloadable wallet software. Users of Blockchain's The PIT. Exchange, institutional custody, and over-the-counter trading services face <u>Blockchain Access UK LTD</u>, a UK company whose primary business is the custody and exchange of virtual currencies. Users of Swap face both entities.

**Blockchain Luxembourg S.A. and the Self-custodied Wallet**

Users of the self-custodied software wallet do not make transaction requests to Blockchain Luxembourg. Instead, they transact themselves, directly with the appropriate virtual currency network.

Unlike virtual currency exchanges, Blockchain Luxembourg does not act as a financial intermediary or a custodian. Blockchain Luxembourg is not a custodial entity and never accepts, holds or transmits its users' virtual currency. Blockchain Luxembourg users can store and spend the same virtual currencies, in as many other industry-standard software wallets as they like *at the same time as they are stored using a Blockchain wallet*. Thus, it is helpful to think of the self-custodied wallet software not as a vault or bank account, but as user interface software for interacting directly with virtual currency networks.

Blockchain Luxembourg cannot: spend virtual currency on a user's behalf (or against the user's wishes); freeze or forfeit virtual currency on law enforcement's behalf; or know the contents of wallets.

Generally speaking, Blockchain Luxembourg does not know its self-custodied wallet users':

- o Wallet balances
- o Transaction history
- o Explorer pages visited
- o Legal names
- o Mailing addresses

        ○    Social security or national ID numbers

## Blockchain Access UK and Financial Services

Customers of Blockchain Access make transaction requests to Blockchain Access for services like Swap and over-the-counter trading. For these products, Users purchase from and sell to Blockchain Access virtual currency on a principal basis. Like the self-custodied wallet provided by Blockchain Luxembourg, these services are noncustodial: Via these services, Blockchain Access never takes custody of virtual currency or government currency owned by its customers. Blockchain does, however, act as a financial counterparty inasmuch as it buys and sells from its customers.

Blockchain Access also operates The PIT Exchange, a custodial exchange featuring a matching engine. This is a custodial product. Users of The PIT Exchange send virtual currency and government currency to addresses and bank accounts controlled by Blockchain Access, which holds that currency until it is withdrawn.

Blockchain Access is a registered Money Services Business in the United States. As such, it collects and records customer information consistent with the risk-based approach required by, e.g., the United States Bank Secrecy Act.

## Frequently Asked Questions

*Does Blockchain respond to law enforcement information requests?*

Yes. Blockchain will respond to valid law enforcement agency information requests. See below for instructions. Note that the most helpful piece of information you can provide is a wallet identifier (e.g. 2td3t671-c54d-ds32-456t-65ftya3b24dd) or PIT Exchange account details. Other data points, like a bitcoin address (e.g. 14eK8q8GXubF2Y9yegRyfpkVm63AsFcefb) or a transaction number (e.g. c1a3cec06316fb13bd0198afc8b15e6edc5123fc5d15383446cc9f3b43ca0734) are significantly less likely to return helpful information.

*I can see, using Blockchain's Block Explorer, that a transaction took place on the Bitcoin (or some other) blockchain. Does this mean that Blockchain's products or services were responsible for the transaction?*

No. Our Block Explorer displays information from public network ledgers. Blockchain publishes all its transactions on these public ledgers, but it is only one of thousands of other software products and services doing so.

*I have a bitcoin address or transaction hash. Can Blockchain correlate this information with any personally-identifying user information?*

If the user simply downloaded and used Blockchain's self-custodied wallet, no. However, if the address or hash was used in a Swap or The PIT Exchange transaction, then Blockchain Access can correlate it to the user's profile. Swap transactions are noncustodial. Thus a customer's executing a Swap transaction does not link the customer in Blockchain's records to other transactions made in the self-custodied wallet.

*I have the name, address, telephone number, or other personally-identifying information of an individual. Can Blockchain correlate this information with other personally identifying information?*

As in the answer above: If the individual is only a self-custodied wallet user, Blockchain Luxembourg is unlikely to have such information. If the individual is a customer of Swap or The PIT Exchange, Blockchain Access can correlate the information with a user profile.

*I have the private key or backup phrase associated with a bitcoin address. What information can Blockchain correlate to these data points?*

None. Blockchain does not know private keys or backup phrases associated with any user wallets.

*I have a wallet identifier. Can blockchain freeze or deliver virtual currency from that wallet?*

No, Blockchain cannot access user's wallets. Blockchain can, however, deliver certain industry-standard log information associated with the wallet including creation date, login time, device ID, operating system, associated email address or telephone numbers (if used for 2-factor ID), together with any encrypted wallet file backed up using Blockchain's servers.

**If you seek information from Blockchain Luxembourg:**

*United Kingdom*: Send either a valid order of an English court or fully-executed Data Protection Act request to legal@blockchain.com, together with a copy of your agency-issued identification. Blockchain will confirm the authenticity of your request and respond via electronic mail.

*Rest of World:* Blockchain will respond to the valid order of a Luxembourg court. A Mutual Legal Assistance Treaty request or letters rogatory may be required.

**If you seek information from Blockchain Access:**

*United States:* Send to legal@blockchain.com (i) a valid subpoena issued in connection with an official criminal investigation for the disclosure of basic subscriber records

(defined in 18 U.S.C. § 2703(c)(2)); (ii) a valid court order; or (iii) a search warrant issued under the procedures described in the Federal Rules of Criminal Procedure or equivalent state warrant procedures upon a showing of probable cause for the disclosure, if any.

*United Kingdom:* Send either a valid order of an English court or fully-executed Data Protection Act request to legal@blockchain.com, together with a copy of your agency-issued identification. Blockchain will confirm the authenticity of your request and respond via electronic mail.

*Rest of World:* Blockchain will respond to the valid order of a Luxembourg court. A Mutual Legal Assistance Treaty request or letters rogatory may be required.

**If your request involves imminent risk of death or serious bodily harm:**

If you are a law enforcement agent requesting information from Blockchain that is likely to prevent death or serious bodily harm, you may contact us on an expedited basis. Together with the appropriate documents listed above, send an email to legal@blockchain.com with "IMMINENT RISK" in the title. In the body of the email, include a brief attestation describing the imminent risk, and Blockchain will endeavor to respond on an expedited basis.