



## Prohibited Uses & Activities

**Last updated: November 2025**

The use of the 360 Spend Card and related services (“Services”) is subject to restrictions to ensure compliance with applicable laws, regulatory requirements, and our own risk policies. By applying for, activating, or using the Card, you agree that you will not use the Services in connection with any prohibited jurisdictions, persons, or activities described below.

### Prohibited Jurisdictions

We do not open accounts, issue cards, or otherwise provide Services to individuals or businesses located in, incorporated in, or primarily operating from jurisdictions we deem prohibited. These include countries or regions subject to comprehensive sanctions, embargoes, or identified by international authorities as high risk.

As of the date of this policy, Services are not available in:

Afghanistan, Belarus, Bosnia, Central African Republic, China (mainland), Congo, Cuba, Eritrea, Haiti, India, Iran, Iraq, Israel, Kosovo, Lebanon, Liberia, Libya, Myanmar, Nepal, Nicaragua, North Korea, Russia, Serbia, Somalia, Sudan, Syria, Turkey, Ukraine (Crimea, Donetsk, and Luhansk regions), Venezuela, Vietnam, Yemen, and Zimbabwe.

This list may be updated at any time in accordance with changes to applicable laws, sanctions regimes, or our own risk assessments.

### Prohibited Persons

You may not use the Services if you are:

- Named on a sanctions, restricted, or denied persons list maintained by the U.S. Department of Treasury’s Office of Foreign Assets Control (OFAC), U.S. Department of Commerce, the European Union, United Nations, or other competent authority; or
- Acting on behalf of, or facilitating transactions for, such prohibited persons or entities.

### Prohibited Activities

The following types of businesses, products, and services are prohibited from using the 360 Spend Card:

#### A. Illegal or Regulated Activities

- Sale or distribution of controlled substances without required licenses.
- Production or sale of firearms, ammunition, or weapons not permitted by law.
- Sale of counterfeit goods, gray-market products, or unlicensed services.
- Gambling, betting, lotteries, or games of chance where prohibited.
- Pornography, child exploitation, or other illegal content.



- Prostitution or illicit escort services.
- Ponzi schemes, pyramid schemes, or deceptive/fraudulent practices.

#### **B. Intellectual Property Infringement**

- Sale or distribution of copyrighted material without authorization (e.g., movies, software, music).
- Counterfeit designer products, unauthorized brand-name goods, or pirated content.
- Any service that directly facilitates trademark, copyright, patent, or trade secret violations.

#### **C. Violence & Hate**

- Promoting or financing violence, terrorism, or physical harm.
- Supporting hate speech or discrimination against any individual or group based on race, religion, gender, disability, sexual orientation, national origin, or other protected status.

#### **D. Misuse of Services**

- Providing false or misleading information during application or while using Services.
- Using the Card or Account for transactions on behalf of undisclosed persons or entities.
- Unauthorized use of Ban Transfer's or 360 Spend's intellectual property, brand, or trade names.
- Any action implying false endorsement, sponsorship, or affiliation with Ban Transfer.

### **4. Restricted Activities**

Certain activities are subject to enhanced due diligence and may be restricted or ineligible for Services, including but not limited to:

- Financial institutions, securities brokers, investment funds, or money service businesses.
- Licensed sale of controlled substances (Schedules II–V) where permitted under applicable law.

### **5. Enforcement**

We may suspend, deny, or terminate your use of the Card or Services if we determine, in our sole discretion, that you have engaged in any prohibited activity. We may also report violations to regulators or law enforcement where required.