Round the Corner — Fraud Policy

CONFIDENTIAL Round the Corner™ - Fraud Detection & Transaction Monitoring Policy Effective Date: August 23, 2025 Purpose This policy governs how RTC prevents, detects, and responds to fraud. It protects customers, vendors, and RTC from financial loss and reputational damage. Scope Applies to the Round the Corner™ app, website, APIs, all payment environments, employees, contractors, and third parties. Definitions Fraud includes payment fraud, account takeovers, chargeback abuse, and synthetic identities. High-risk actions include vendor onboarding, payouts, and refunds. Preventive Controls Vendor onboarding requires EIN/SSN, W-9, banking info, and parental approval for ages 15-17. Payments only via Apple/Google Pay. Daily payouts via ACH (our payment partner). RTC reserves the right to charge back vendors for excessive refunds. Monitoring RTC risk-scores logins, payments, and onboarding. We monitor anomalies such as unusual spikes in orders or mismatched data. Vendors under probation are monitored for 90 days. Incident Response When fraud is suspected, RTC may freeze accounts, withhold payouts, investigate, and share data with processors or law enforcement. Enforcement RTC may suspend or terminate accounts, delay payouts, or pursue civil/criminal action. Refunds remain RTC's responsibility, with vendor chargebacks for excessive refunds. Review This Fraud Policy is effective August 23, 2025 and will be reviewed quarterly or after major fraud incidents.

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