

SAMPLE — REDACTED. The firm, its domains, its app identifiers and the scanning IPs are removed; everything else is as delivered.

NorthPoint Marketing Solutions Oy · Non-EEA Marketing Monitor · evidence-of-scan record

Exchange A — EEA marketing surface scan, 2026-09-27

Period 2026-09 · report generated 2026-09-27 16:56 UTC · vantage: EEA residential IP — Helsinki, Finland (consumer ISP; IP withheld), headless Chromium

Verdict — POTENTIAL EEA NEXUS — REVIEW

No high-severity targeting observed, but medium signals present an EEA nexus that warrants a human read within scope.

Flags: 0 high · 16 medium · 3 low · surfaces examined: 9 classes, 60 fetches (26 HTTP 200)

Statement for the compliance file. On 2026-09-27, NorthPoint examined the public marketing surfaces of Exchange A listed under *Scope* below from an EEA vantage point (residential IP, Helsinki, Finland; pages rendered in a headless browser) and recorded every fetch with its time and a SHA-256 of the body. The EEA-targeting signals listed under *Findings* were observed within that scope. This record documents the scan performed; it records what was observed, is not a statement about the firm's regulatory status, and is not legal advice.

Scope — what was examined

#	Surface	Result
1	S1 homepage https://www.exchange-a.example/ (rendered)	
2	S2 sitemap https://www.exchange-a.example/sitemap.xml	
3	S3 EEA language paths probed: /de /fr /nl /pl /it /es /fi /sv /da /el /cs /hu /ro /pt (+?lang=)	none served in-language
4	S4 buy/deposit/fiat pages linked from the homepage	5 fetched (https://www.exchange-a.example/en-GB/p2p, https://www.exchange-a.example/en-GB/cards, https://www.exchange-a.example/en-GB/buy-sell, https://www.exchange-a.example/en-GB/exchange-a-card, https://www.exchange-a.example/en-GB/sell-to-card)
5	S5 terms / user agreement: 0 page(s) read for a restricted-jurisdictions clause	no clause found
6	S6 Apple App Store	10 EEA storefronts queried: listed in Germany, France, Finland, Poland, Italy, Spain, Sweden, Denmark, Ireland
7	S7 Google Play	app id(s) com.exchange-a.app; EEA storefronts served: Germany, France, Netherlands, Finland, Poland
8	S8 EEA ccTLD variants (.eu .de .fr .nl .fi .pl .it .es)	none resolving to the client

9	S9 affiliate / referral / bonus / campaign pages	3 fetched, country-named EEA promotions: 0
10	OUT OF SCOPE (stated, not scanned)	paid social & ad libraries (Meta Ad Library is token-gated), X / Telegram / Discord (authenticated), content behind login, geo-targeted ads.
11	R4 geo-differentiation: Control leg BLOCKED by a bot challenge (Just a moment...)	not a geo decision; R4b rests on the EEA leg alone.

Findings — observed EEA-targeting signals

#	Severity	Signal	Surface	Evidence
1	MEDIUM	Marketing surface offered in German (de) — an EEA official language German is an EEA-market language (medium exclusivity)	website (hreflang/lang)	hreflang/lang="de" present on https://www.exchange-a.example/ (fetched 2026-09-27T16:54:08Z, sha256 cfd4799ed12...)
2	MEDIUM	No geo-block: full marketing site reachable and functional from an EEA IP An unlicensed non-EEA firm leaving its marketing site open to EEA IPs is an exposure	website (EU-IP vantage)	Full marketing site rendered from an EEA residential IP on the homepage with no region-block screen (text 2543 chars, sha256 482c1ecd9bd2...).
3	MEDIUM	App available in EEA storefront: Apple App Store — Germany (DE) An app listed in an EEA country storefront is marketing/availability in the EEA	app store	"Exchange A: Trade BTC, ETH, DOGE" by [publisher redacted] (app id redacted) returned by the Germany storefront (https://itunes.apple.com/search?term=Exchange A&country=de&entity=software&limit=5) at 2026-09-27T16:55:30Z
4	MEDIUM	App available in EEA storefront: Apple App Store — France (FR) An app listed in an EEA country storefront is marketing/availability in the EEA	app store	"Exchange A:Bitcoin Wallet" by [publisher redacted] (app id redacted) returned by the France storefront (https://itunes.apple.com/search?term=Exchange A&country=fr&entity=software&limit=5) at 2026-09-27T16:55:30Z
5	MEDIUM	App available in EEA storefront: Apple App Store — Finland (FI) An app listed in an EEA country storefront is marketing/availability in the EEA	app store	"Exchange A: Buy Crypto & Stocks" by [publisher redacted] (app id redacted) returned by the Finland storefront (https://itunes.apple.com/search?term=Exchange A&country=fi&entity=software&limit=5) at 2026-09-27T16:55:31Z
6	MEDIUM	App available in EEA storefront: Apple App Store — Poland (PL) An app listed in an EEA country storefront is marketing/availability in the EEA	app store	"Exchange A: Buy Crypto & Stocks" by [publisher redacted] (app id redacted) returned by the Poland storefront (https://itunes.apple.com/search?term=Exchange A&country=pl&entity=software&limit=5) at 2026-09-27T16:55:31Z

7	MEDIUM	App available in EEA storefront: Apple App Store — Italy (IT) An app listed in an EEA country storefront is marketing/availability in the EEA	app store	"Exchange A: Buy Crypto & Stocks" by [publisher redacted] (app id redacted) returned by the Italy storefront (https://itunes.apple.com/search?term=Exchange A&country=it&entity=software&limit=5) at 2026-09-27T16:55:32Z
8	MEDIUM	App available in EEA storefront: Apple App Store — Spain (ES) An app listed in an EEA country storefront is marketing/availability in the EEA	app store	"Exchange A: Trade BTC, ETH, SHIB" by [publisher redacted] (app id redacted) returned by the Spain storefront (https://itunes.apple.com/search?term=Exchange A&country=es&entity=software&limit=5) at 2026-09-27T16:55:32Z
9	MEDIUM	App available in EEA storefront: Apple App Store — Sweden (SE) An app listed in an EEA country storefront is marketing/availability in the EEA	app store	"Exchange A: Buy Crypto & Stocks" by [publisher redacted] (app id redacted) returned by the Sweden storefront (https://itunes.apple.com/search?term=Exchange A&country=se&entity=software&limit=5) at 2026-09-27T16:55:32Z
10	MEDIUM	App available in EEA storefront: Apple App Store — Denmark (DK) An app listed in an EEA country storefront is marketing/availability in the EEA	app store	"Exchange A: Buy Crypto & Stocks" by [publisher redacted] (app id redacted) returned by the Denmark storefront (https://itunes.apple.com/search?term=Exchange A&country=dk&entity=software&limit=5) at 2026-09-27T16:55:32Z
11	MEDIUM	App available in EEA storefront: Apple App Store — Ireland (IE) An app listed in an EEA country storefront is marketing/availability in the EEA	app store	"Exchange A: Buy Crypto & Stocks" by [publisher redacted] (app id redacted) returned by the Ireland storefront (https://itunes.apple.com/search?term=Exchange A&country=ie&entity=software&limit=5) at 2026-09-27T16:55:33Z
12	MEDIUM	App available in EEA storefront: Google Play — Germany (DE) An app listed in an EEA country storefront is marketing/availability in the EEA	app store	com.exchange-a.app listing served with gl=DE at 2026-09-27T16:55:33Z (sha256 ab3adc068f16...)
13	MEDIUM	App available in EEA storefront: Google Play — France (FR) An app listed in an EEA country storefront is marketing/availability in the EEA	app store	com.exchange-a.app listing served with gl=FR at 2026-09-27T16:55:34Z (sha256 c53a51c21d7a...)
14	MEDIUM	App available in EEA storefront: Google Play — Netherlands (NL) An app listed in an EEA country storefront is	app store	com.exchange-a.app listing served with gl=NL at 2026-09-27T16:55:34Z (sha256 7dfe92b915f8...)

		marketing/availability in the EEA		
15	MEDIUM	App available in EEA storefront: Google Play — Finland (FI) An app listed in an EEA country storefront is marketing/availability in the EEA	app store	com.exchange-a.app listing served with gl=FI at 2026-09-27T16:55:34Z (sha256 bda5bab11492...)
16	MEDIUM	App available in EEA storefront: Google Play — Poland (PL) An app listed in an EEA country storefront is marketing/availability in the EEA	app store	com.exchange-a.app listing served with gl=PL at 2026-09-27T16:55:35Z (sha256 4d9376b3db0a...)
17	LOW	Marketing surface offered in Spanish (es) — an EEA official language Spanish is an EEA-market language (low exclusivity)	website (hreflang/lang)	hreflang/lang="es" present on https://www.exchange-a.example/ (fetched 2026-09-27T16:54:08Z, sha256 cfda4799ed12...)
18	LOW	Marketing surface offered in French (fr) — an EEA official language French is an EEA-market language (low exclusivity)	website (hreflang/lang)	hreflang/lang="fr" present on https://www.exchange-a.example/ (fetched 2026-09-27T16:54:08Z, sha256 cfda4799ed12...)
19	LOW	Marketing surface offered in Portuguese (pt) — an EEA official language Portuguese is an EEA-market language (low exclusivity)	website (hreflang/lang)	hreflang/lang="pt" present on https://www.exchange-a.example/ (fetched 2026-09-27T16:54:08Z, sha256 cfda4799ed12...)

Internal triage notes — observations that are not findings

Kept separate so the statement above stays clean and defensible while nothing real is lost.

Surface	Observation
S1 homepage	title "Exchange A Exchange: Buy & Sell Bitcoin, Ethereum & 1700+ Cryptos"; hreflang/lang: ['ar', 'de', 'en', 'es', 'fa', 'fr', 'ja', 'ko', 'pt', 'ru', 'uk', 'vi', 'zh']; switcher languages (EEA): ['de', 'es', 'fr', 'pt']
S2 sitemap	12 URLs listed; EEA-locale URLs: none
S4 fiat page	https://www.exchange-a.example/en-GB/p2p: EUR=False SEPA=False
S4 fiat page	https://www.exchange-a.example/en-GB/cards: EUR=False SEPA=False
S4 fiat page	https://www.exchange-a.example/en-GB/buy-sell: EUR=False SEPA=False
S4 fiat page	https://www.exchange-a.example/en-GB/exchange-a-card: EUR=False SEPA=False

S4 fiat page	https://www.exchange-a.example/en-GB/sell-to-card: EUR=False SEPA=False
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Vantage check (R4)

Control leg BLOCKED by a bot challenge (Just a moment...) — not a geo decision; R4b rests on the EEA leg alone.

Control leg: US datacentre IP — Columbus, Ohio (IP withheld), headless Chromium — homepage title “Just a moment...”, status .

Month-over-month

Baseline scan — this record becomes the artefact next month's report is diffed against (stored durably: kv).

Appendix A — every fetch, with timestamp and hash

Surface	URL	UTC	Status	Rendered	SHA-256 (body)
S1 homepage	https://www.exchange-a.example/	16:54:08	200	yes	cfda4799ed12767f
S2 sitemap	https://www.exchange-a.example/sitemap.xml	16:54:15	200		a7c1aba00a020d10
S3 lang probe de	https://www.exchange-a.example/de/	16:54:15	404		813d315011e17061
S3 lang probe de	https://www.exchange-a.example/de	16:54:16	404		d4f54a3e00121357
S3 lang probe de	https://www.exchange-a.example/?lang=de	16:54:17	200		de7f26684fa015c6
S3 lang probe fr	https://www.exchange-a.example/fr/	16:54:18	404		2a6644a79b7f1bd7
S3 lang probe fr	https://www.exchange-a.example/fr	16:54:19	404		71c008039b974822
S3 lang probe fr	https://www.exchange-a.example/?lang=fr	16:54:19	200		c9e01bd87cc21933
S3 lang probe nl	https://www.exchange-a.example/nl/	16:54:21	404		957fafd5038cdc3c
S3 lang probe nl	https://www.exchange-a.example/nl	16:54:23	404		66ab58070d1dffa7
S3 lang probe nl	https://www.exchange-a.example/?lang=nl	16:54:24	200		557a3f603daca737
S3 lang probe pl	https://www.exchange-a.example/pl/	16:54:25	404		f5db3e959198c4c6
S3 lang probe pl	https://www.exchange-a.example/pl	16:54:25	404		530e887a438eca74
S3 lang probe pl	https://www.exchange-a.example/?lang=pl	16:54:26	200		47275e59504307a6

S3 lang probe it	https://www.exchange-a.example/it/	16:54:28	404		da5b1e536398101d
S3 lang probe it	https://www.exchange-a.example/it	16:54:28	404		3c3d19b0b4104a83
S3 lang probe it	https://www.exchange-a.example/?lang=it	16:54:29	429		87c7b12ce120ed14
S3 lang probe es	https://www.exchange-a.example/es/	16:54:31	429		f7d30bfb1b24901d
S3 lang probe fi	https://www.exchange-a.example/fi/	16:54:33	429		c10122759d1fde0c
S3 lang probe sv	https://www.exchange-a.example/sv/	16:54:35	429		4f3b596bcb2e7733
S3 lang probe da	https://www.exchange-a.example/da/	16:54:38	429		881fc46e94eef1c9
S3 lang probe el	https://www.exchange-a.example/el/	16:54:40	429		79a5ade1e1098e71
S3 lang probe cs	https://www.exchange-a.example/cs/	16:54:42	429		4ddce5144dcf5535
S3 lang probe hu	https://www.exchange-a.example/hu/	16:54:44	429		e217158b58d4a188
S3 lang probe ro	https://www.exchange-a.example/ro/	16:54:47	429		e96fa3878e8dadb6
S3 lang probe pt	https://www.exchange-a.example/pt/	16:54:49	429		72ec5edb89b2df80
S4 fiat page	https://www.exchange-a.example/en-GB/p2p	16:54:51	429	yes	9bd19df1442502c8
S4 fiat page	https://www.exchange-a.example/en-GB/cards	16:54:56	429	yes	9ec35cf1a19ded7e
S4 fiat page	https://www.exchange-a.example/en-GB/buy-sell	16:55:00	429	yes	7c69bcfb046a1100
S4 fiat page	https://www.exchange-a.example/en-GB/exchange-a-card	16:55:04	429	yes	dc76bde7fa898e85
S4 fiat page	https://www.exchange-a.example/en-GB/sell-to-card	16:55:07	429	yes	95616edb37f21110
S5 terms	https://www.exchange-a.example/terms	16:55:11	429	yes	4fad85426dad5d7e
S5 terms	https://www.exchange-a.example/terms-of-service	16:55:15	429	yes	8d14cc32fe43686c
S5 terms	https://www.exchange-a.example/legal	16:55:18	429	yes	3a5b9d7eefe15a16
S5 terms	https://www.exchange-a.example/user-agreement	16:55:22	429	yes	a9ff222d68cda6cf
S5 terms	https://www.exchange-a.example/en-US/terms	16:55:26	429	yes	d7a0c0f3923eabcc
S6 apple de	https://itunes.apple.com/search?term=Exchange&country=de&entity=software&limit=5	16:55:30	200		cd693da63283d094

S6 apple fr	https://itunes.apple.com/search?term=ExchangeA&country=fr&entity=software&limit=5	16:55:30	200		3bf65d7f4ef73aaf
S6 apple nl	https://itunes.apple.com/search?term=ExchangeA&country=nl&entity=software&limit=5	16:55:31	200		8c584ae0eb3b6be6
S6 apple fi	https://itunes.apple.com/search?term=ExchangeA&country=fi&entity=software&limit=5	16:55:31	200		7f8a801ea42dfa24
S6 apple pl	https://itunes.apple.com/search?term=ExchangeA&country=pl&entity=software&limit=5	16:55:31	200		a7717f6b095be872
S6 apple it	https://itunes.apple.com/search?term=ExchangeA&country=it&entity=software&limit=5	16:55:32	200		0f54c11ac294e9a7
S6 apple es	https://itunes.apple.com/search?term=ExchangeA&country=es&entity=software&limit=5	16:55:32	200		62f0437f131aff4c
S6 apple se	https://itunes.apple.com/search?term=ExchangeA&country=se&entity=software&limit=5	16:55:32	200		81801821c1e921ef
S6 apple dk	https://itunes.apple.com/search?term=ExchangeA&country=dk&entity=software&limit=5	16:55:32	200		c6baeb478ea12dd2
S6 apple ie	https://itunes.apple.com/search?term=ExchangeA&country=ie&entity=software&limit=5	16:55:33	200		debfcf66fa6927c1
S7 play de	https://play.google.com/store/apps/details?id=com.exchange-a.app&gl=DE&hl=en	16:55:33	200		ab3adc068f169fc2
S7 play fr	https://play.google.com/store/apps/details?id=com.exchange-a.app&gl=FR&hl=en	16:55:34	200		c53a51c21d7a6fb2
S7 play nl	https://play.google.com/store/apps/details?id=com.exchange-a.app&gl=NL&hl=en	16:55:34	200		7dfe92b915f85e11
S7 play fi	https://play.google.com/store/apps/details?id=com.exchange-a.app&gl=FI&hl=en	16:55:34	200		bda5bab114928faf
S7 play pl	https://play.google.com/store/apps/details?id=com.exchange-a.app&gl=PL&hl=en	16:55:35	200		4d9376b3db0af900
S8 domain eu	https://exchange-a.eu/	16:55:35	200		dd7a0ca4d8ac0c05
S8 domain de	https://exchange-a.de/	16:55:36	200		414e4b6c867c07b8
S8 domain fr	https://exchange-a.fr/	16:55:36	200		9b813be4e6b92b8c
S8 domain nl	https://exchange-a.nl/	16:55:37	SSLError		
S8 domain pl	https://exchange-a.pl/	16:55:37	200		a351f342656d85e2

S8 domain es	https://exchange-a.es/	16:55:38	200		dd7a0ca4d8ac0c05
S9 promo	https://www.exchange-a.example/en-GB/staking	16:55:38	429	yes	74c00b523ac6f454
S9 promo	https://www.exchange-a.example/affiliate-partner	16:55:41	429	yes	a65a762387b9389c
S9 promo	https://www.exchange-a.example/referral	16:55:45	429	yes	28a38a69554abcb7

Scope & disclaimer

This report documents the marketing surfaces NorthPoint scanned for the named client on the stated date, from an EEA vantage point, and any EEA-targeting signals observed within that defined scope. It is an evidence-of-scan record for the recipient's compliance file. It is NOT a statement about the client's status under MiCA or any other regime, is NOT legal advice, and does not cover surfaces outside the stated scope (e.g. invisible geo-targeted paid ads, private/DM/closed-group promotion, or content behind login).

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