

THE GREAT CARD-TO-CRYPTO MIGRATION

Unlocking the Multi-Trillion-Dollar Prepaid Card Economy
Through Enterprise Card-to-Crypto (C2C) Transactions

INDUSTRY WHITEPAPER | EDITION 2025 – 2026
Fintech Research & Strategy Division
Version 1.0 | February 2026

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 Key Risk Disclosures: (1) Most C2C transactions carry processing fees of 10–20% of the transaction value. (2) Transaction processing typically takes 1–3 business days. (3) Cryptocurrency values are volatile and may change between initiation and completion. (4) Customers are solely responsible for providing accurate wallet addresses; service providers bear no liability for funds sent to incorrect addresses. (5) All processed transactions are final and cannot be reversed. (6) Large transactions may require additional identity verification. (7) Service availability varies significantly by jurisdiction.

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Executive Summary

"The convergence of a \$5.4 trillion prepaid card market, 1.4 billion unbanked adults, and a \$260-billion stablecoin ecosystem is not coincidence — it is the blueprint for the next great financial revolution."

We stand at a historic inflection point in global finance. The prepaid gift card market — long regarded as a simple retail instrument — has quietly grown into one of the most significant pools of stranded financial value in the world. The global prepaid gift card market is projected to reach \$5.41 trillion by 2034. In the United States alone, consumers leave over \$15 billion in gift card balances unused every year. Globally, hundreds of billions of dollars in card value lie dormant, unredeemed, and increasingly irrelevant to the holders who received them.

At the same time, cryptocurrency — and stablecoins in particular — has crossed the threshold from speculative asset to functional financial infrastructure. Stablecoin trading volume reached \$23 trillion in 2024. The two largest stablecoins alone command a combined market capitalization exceeding \$260 billion. Regulatory frameworks from the EU's MiCA to the U.S. GENIUS Act are rapidly formalizing the space, bringing institutional confidence to what was once a regulatory grey zone.

The convergence of these two forces — stranded card value and ascendant digital assets — defines the Card-to-Crypto (C2C) opportunity. Enterprise C2C platforms offer a mechanism by which prepaid card balances issued by major card brands including Visa, Mastercard, and American Express can be converted into cryptocurrency or stablecoins, unlocking liquidity for the holder and creating a new category of financial service.

\$292.89 Billion Global gift card market size in 2025, growing at 7.99% CAGR through 2035

1.4 Billion Unbanked adults worldwide who could benefit from C2C financial access pathways

\$23 Trillion Stablecoin trading volume in 2024 — a 90% year-on-year increase

10–20% Typical processing fee range for C2C conversion transactions

This whitepaper provides the first comprehensive, enterprise-grade analysis of the C2C sector. It covers the full transaction lifecycle, regulatory requirements, risk management imperatives, technology architecture, business models, and the transformative potential for financial inclusion in developing markets. It is designed for fintech operators, institutional investors, compliance professionals, card network executives, and policymakers who seek to understand and capitalize on what may become the defining financial services innovation of this decade.

Section 1: Market Context — The Prepaid Card Economy

1.1 The Scale of the Opportunity

The global prepaid card market represents one of the most underappreciated financial ecosystems on earth. According to Market Research Future analysis, the Gift Card and Incentive Card market was valued at \$271.22 billion in 2024 and is projected to grow from \$292.89 billion in 2025 to \$631.87 billion by 2035, exhibiting a compound annual growth rate (CAGR) of 7.99% over the forecast period. Some market analyses, taking a broader view that includes all prepaid card categories — payroll cards, government benefit cards, general-purpose reloadable cards, and gift cards — place the total addressable market far higher, with projections approaching \$5.41 trillion by 2034.

In the United States, the numbers are staggering. The U.S. gift card market is expected to grow by 7.9% annually, reaching \$234.14 billion in 2025. The U.S. prepaid card and digital wallet market is on a continuous growth path, projected to reach \$749.46 billion by 2025 and approximately \$1.06 trillion by 2029. North America accounts for approximately 36.23% of the global prepaid market share, making it the single largest regional market.

1.2 The Dormancy Problem — Billions in Stranded Value

Despite this massive market size, a structural inefficiency lies at its heart. Research consistently shows that a significant proportion of gift card value — estimated at over \$15 billion annually in the U.S. alone — goes unredeemed. Cards are lost, forgotten, partially used, or simply become inaccessible to holders who have changed circumstances, moved internationally, or whose issuing retailer has gone out of business.

This dormancy problem has multiple dimensions. From the consumer perspective, it represents a direct loss of purchasing power. From the issuer perspective, dormant balances are carried as liabilities on balance sheets. From a macroeconomic perspective, this represents a misallocation of financial resources on a massive scale. The Card-to-Crypto conversion pathway offers a structural solution: converting stranded card value into universally liquid, globally transferable digital assets.

Table 1.1: U.S. Prepaid Card Market Segments — 2025 Estimates

Card Segment	Estimated Market Value	Primary Use Case
Open-Loop Gift Cards (Visa/MC/Amex)	\$54–80 Billion	General retail and online purchase
Closed-Loop Retail Gift Cards	\$100+ Billion	Specific retailer redemption
General Purpose Reloadable (GPR)	\$300+ Billion	Banking substitute for unbanked
Payroll & Government Benefit Cards	\$200+ Billion	Wage disbursement & social programs
Corporate Incentive Cards	\$50+ Billion	Employee rewards & B2B programs
Travel & Forex Prepaid	\$30+ Billion	International travel & FX management

The open-loop segment — cards bearing the Visa, Mastercard, or American Express brand — is the primary focus of enterprise C2C platforms. These cards are not restricted to a single merchant, making

them the most versatile and most readily convertible to digital assets. Their network brand creates a recognized standard for value that simplifies the verification process inherent in C2C transactions.

1.3 Market Drivers Accelerating Prepaid Card Growth

Several structural forces are combining to accelerate prepaid card adoption worldwide, many of which directly increase the total addressable market for C2C services.

- **Digital Commerce Expansion:** The rise of e-commerce has dramatically expanded the utility of digital gift cards. The ability to purchase, send, and redeem gift cards entirely digitally has lowered friction and driven volume, particularly among younger demographics who conduct the majority of their financial transactions through mobile devices.
- **Corporate Incentive Programs:** Enterprises increasingly issue prepaid cards as part of employee wellness programs, performance rewards, sales incentive schemes, and customer loyalty programs. This institutional demand adds a significant B2B dimension to the prepaid market, creating large-volume, enterprise-grade conversion opportunities.
- **Financial Inclusion Initiatives:** Governments and non-governmental organizations in developing markets have turned to prepaid cards as a mechanism for disbursing social assistance, delivering wages to unbanked workers, and providing humanitarian aid. This use case is expanding rapidly across Sub-Saharan Africa, Southeast Asia, and Latin America.
- **Contactless and Mobile Wallet Integration:** Leading players including Visa, Mastercard, PayPal, and Blackhawk Network are advancing user engagement through contactless technology and multi-currency compatibility. In November 2024, Blackhawk Network introduced Visa- and Mastercard-branded e-gift cards supporting QR code and tap-to-pay technology, a development that simultaneously expands the card ecosystem and increases conversion opportunities.
- **Cryptocurrency-Linked Product Innovation:** Competition in the U.S. gift card market is expected to intensify as companies enhance digital platforms and explore new technologies such as cryptocurrency-based gift cards, strategic acquisitions, and cross-asset financial instruments.

1.4 The Closed-Loop vs. Open-Loop Distinction

A critical distinction for C2C operators is between closed-loop and open-loop prepaid cards. Closed-loop cards, which can only be used at specific retailers or chains, dominate the market by value but present technical challenges for direct crypto conversion because their value is inherently tied to a specific merchant relationship. Open-loop cards, bearing major network branding, behave more like debit instruments and can be processed through standard payment rails, making them far more suitable for enterprise C2C operations.

That said, the C2C industry has developed indirect pathways for closed-loop card conversion as well — notably through secondary market platforms and P2P exchange mechanisms — a sector that operates in a more complex regulatory environment and is addressed in detail in Section 12.

Section 2: The C2C Opportunity — Why Now?

2.1 The Perfect Storm — Four Converging Forces

The emergence of viable enterprise C2C infrastructure in 2024–2026 is not accidental. It is the product of four converging structural forces that have each individually reached critical mass, and whose intersection creates a market window of historic proportions.

Force 1: Stablecoin Maturation

The stablecoin market has undergone a transformation from speculative instrument to functional financial infrastructure. The market capitalization of the two largest stablecoins has tripled since 2023, reaching a combined \$260 billion. Trading volume increased by 90%, amounting to \$23 trillion in 2024. Asia leads with the highest volume of stablecoin activity, exceeding North America. In relative terms, Africa, the Middle East, and Latin America stand out for the highest stablecoin usage relative to GDP — precisely the markets with the greatest concentrations of prepaid card users and unbanked populations.

Critically, stablecoins are no longer purely speculative. They function as settlement currencies, remittance vehicles, and store-of-value instruments. Their peg to the U.S. dollar eliminates the price volatility concern for end users who are converting card balances not to speculate but to access liquid, globally-usable value.

Force 2: Regulatory Crystallization

For years, C2C operators faced a fundamental uncertainty: would regulators treat crypto-card conversions as currency exchange, money transmission, or something else entirely? That uncertainty is rapidly resolving. The EU's Markets in Crypto-Assets (MiCA) Regulation fully came into application on December 30, 2024, introducing harmonized rules for crypto-asset service providers across all EU member states. In the United States, the GENIUS Act of 2025, working alongside the STABLE Act, is bringing stablecoin issuers directly under the purview of the Bank Secrecy Act with clear KYC/AML/CFT requirements. Visa's 2024 rule changes established explicit standards for crypto and stablecoin transactions, including requirements for enhanced KYC, AML, and sanctions screening — codifying C2C within the existing card network compliance framework.

This regulatory crystallization, while creating compliance costs, simultaneously creates market legitimacy. Institutional partners — banks, payment processors, and major enterprises — are now able to engage with C2C platforms within a defined regulatory envelope, unlocking access to corporate capital and distribution partnerships.

Force 3: Technology Infrastructure Readiness

The blockchain infrastructure underlying C2C transactions has matured dramatically. Ethereum's daily transaction volume has climbed to over 1 million, driven by DeFi and stablecoin applications. Layer-2 solutions have reduced gas fees to near-zero for stablecoin transfers. TRON leads with 70.46% of all USDT payments made through major gateways, offering near-instant, near-free stablecoin transfers. Binance Smart Chain follows at 63.76% USDT payment share on low-fee networks. The technological barrier to executing a C2C transaction — once measured in days and significant gas costs — has collapsed to near real-time settlement at minimal infrastructure cost.

Force 4: The Unbanked Demand Surge

Approximately 1.4 billion adults worldwide remain unbanked as of 2025. In Southeast Asia, 70% of adults are unbanked or underbanked. In Africa, around 57% of adults still lack bank accounts. In 2025, about 15% of unbanked individuals globally already use cryptocurrency for financial transfers. This population increasingly has access to prepaid cards — through remittances received, government benefit programs, employer disbursements, or humanitarian aid — but lacks access to banking rails to convert those cards into broadly usable value. C2C platforms serve as the technological bridge between the card economy and the crypto-native economy, creating financial access for a population that has been systematically excluded from traditional finance.

2.2 Why Stablecoins Are the Optimal Output Asset

While C2C platforms may offer conversion to Bitcoin, Ethereum, or other volatile cryptocurrencies, stablecoins — particularly USDT and USDC — have emerged as the dominant output preference for most use cases. There are three compelling reasons for this.

First, they eliminate conversion-timing risk. Because C2C transactions take 1–3 business days to process, a volatile crypto output means the recipient may receive significantly less (or more) value than expected at the time of initiation. Stablecoins maintain parity with the U.S. dollar throughout the settlement window, providing certainty of value for the user.

Second, stablecoins are optimized for the primary use cases driving C2C demand: remittances, everyday spending, and financial storage. Blockchain and stablecoin solutions reduce remittance fees to as low as 1–3%, compared to an average remittance cost of 6.5% through traditional channels and up to 8.37% for Sub-Saharan African corridors. For a card-holding migrant worker seeking to send value home, converting a prepaid card to USDT and transferring it via blockchain is dramatically cheaper and faster than any traditional alternative.

Third, stablecoins offer inflation protection. In high-inflation economies — Argentina, Venezuela, Nigeria, Turkey — access to USD-pegged digital assets represents a qualitatively superior financial instrument to holding local currency. The ability to convert locally-received prepaid cards into dollar-denominated stablecoins provides real economic value that goes far beyond simple payment convenience.

2.3 The C2C Value Proposition — A Summary Framework

C2C VALUE EQUATION: Card Holder receives LIQUIDITY + GLOBAL UTILITY + INFLATION PROTECTION + FINANCIAL INCLUSION in exchange for a processing fee of 10–20%, compared to the alternative of card dormancy (100% value loss) or restricted single-merchant redemption.

The economic logic of C2C is compelling precisely because the alternative — card dormancy — represents a 100% value loss. A 10–20% processing fee, while significant, is rational for a card holder who would otherwise lose the entire value of the card. This asymmetry between the cost of conversion and the cost of non-conversion is the fundamental economic driver of C2C demand, particularly in markets where card holders lack access to conventional cash-out mechanisms.

Section 3: How C2C Transactions Work

3.1 The Transaction Lifecycle — End to End

Understanding the full C2C transaction lifecycle is essential for operators, compliance professionals, and institutional partners. The process involves multiple verification stages, financial flows, and risk checkpoints, each of which must be engineered to balance user experience with regulatory compliance.

Stage 1: Customer Onboarding & KYC

All enterprise C2C platforms operating under applicable regulatory frameworks must conduct Know Your Customer (KYC) verification before processing transactions. KYC programs universally include three components: customer identification (legal name, date of birth, address, identity document verification), customer due diligence (CDD, including risk scoring and background checks), and continuous monitoring (ongoing transaction surveillance for suspicious activity patterns).

For individual users, KYC documentation typically includes a government-issued photo ID and, for larger transactions, proof of address. Many platforms implement tiered verification: daily sales up to \$500 are permitted at basic verification levels, with enhanced verification required for limit increases up to \$10,000 and above. For enterprise or B2B customers, additional documentation including business licenses and corporate formation documents is standard.

Stage 2: Card Submission & Verification

Once KYC is satisfied, the customer submits card details — typically the card number, expiration date, and CVV for physical cards, or the redemption code for digital gift cards. The platform verifies the card balance through issuer APIs or manual verification processes. This stage typically includes:

- Balance verification with the issuing network
- Fraud screening to identify cards reported stolen or associated with fraudulent activity
- Sanction screening against OFAC and other relevant watchlists
- Geographic eligibility confirmation (service availability varies by jurisdiction)

Stage 3: Fee Disclosure & Rate Lock

Regulatory best practice, reinforced by Visa's 2024 framework, requires clear pre-transaction disclosure of all fees and conditions. The customer must receive and acknowledge:

- The applicable processing fee (typically 10–20% of the card value)
- The current exchange rate for the chosen cryptocurrency output
- The estimated settlement window (1–3 business days)
- Confirmation that the transaction is final and non-reversible once initiated
- Explicit acknowledgment that the customer is solely responsible for providing the correct wallet address

The rate lock mechanism is a critical technical and commercial challenge for C2C operators. Because cryptocurrency values are volatile and may change significantly during the 1–3 business day processing window, operators must decide at which point to lock the conversion rate. Early-stage platforms often

quote a rate at initiation, creating price risk for the operator during the settlement window. More sophisticated platforms use dynamic rate mechanisms, locking the rate closer to settlement.

Stage 4: Card Processing & Value Extraction

The core of the C2C transaction involves extracting the monetary value from the prepaid card. For open-loop Visa, Mastercard, and Amex cards, this is typically accomplished through:

- Authorized direct-to-bank transfer using the card as funding source
- Tokenization and payment processing through a licensed payment facilitator
- Account funding transaction (AFT) mechanisms under the card network's digital asset rules

For closed-loop retail gift cards, the process is more complex, often involving secondary market mechanisms, P2P matching with retail purchasers, or direct retailer balance extraction. This segment carries significantly higher fraud risk and typically commands higher processing fees.

Stage 5: Crypto Delivery to Wallet

Upon successful card processing, the platform delivers the agreed cryptocurrency amount (minus fees) to the customer's specified wallet address. This is the point of maximum irreversibility: once a blockchain transaction is broadcast, it cannot be recalled. The customer's responsibility for providing an accurate wallet address is therefore absolute, and platforms must design their UX to minimize wallet address input errors — a significant source of user losses in early C2C platforms.

Delivery confirmation is provided via blockchain transaction hash, giving the customer an immutable record of the transfer. Full settlement, including all blockchain confirmations, typically occurs within the 1–3 business day processing window, though many stablecoin transfers on low-fee networks settle in minutes.

3.2 Processing Fee Economics — The 10–20% Structure

The 10–20% processing fee that characterizes most enterprise C2C transactions reflects a multi-layered cost and risk structure that differs fundamentally from conventional payment processing economics.

Table 3.1: C2C Processing Fee Component Analysis

Cost Component	Estimated Range	Description
Card Network Processing Fee	1.5–3.5%	Interchange and network fees for card transactions
AML/KYC Compliance	1–2%	Identity verification, screening, monitoring costs
Fraud & Chargeback Reserve	2–4%	Reserve for fraudulent card claims and disputes
Crypto Spread & Slippage	1–3%	Exchange rate margin and market execution costs
Price Volatility Buffer	1–3%	Operator hedge against crypto price movement during settlement
Platform Operating Margin	2–5%	Technology, staffing, and profit margin
Regulatory & Licensing Cost	0.5–1%	Compliance infrastructure amortization

TOTAL (illustrative)	9–21.5%	Consistent with observed 10–20% market rate
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The fee structure reveals why the 10–20% range is economically rational rather than predatory. The dominant cost drivers are fraud reserve requirements (gift card fraud is pervasive and sophisticated), compliance infrastructure, and the crypto price volatility buffer. Platforms that operate at the lower end of this range typically do so through superior fraud prevention technology, efficient compliance infrastructure, and use of low-cost blockchain networks (TRON, BSC) for stablecoin delivery.

3.3 Transaction Timing — The 1–3 Business Day Window

The 1–3 business day processing window that characterizes most C2C transactions reflects the operational realities of multiple sequential processing steps: card balance verification (0–4 hours), AML/KYC clearing (1–24 hours), payment processing and settlement (1–2 business days), and blockchain transaction broadcast and confirmation (near-instantaneous to 2 hours depending on network and congestion).

The dominant delay in most C2C transactions is not the blockchain step — it is the card processing and compliance stages. Platforms investing in real-time card verification APIs and automated KYC workflows are progressively compressing this window, with some next-generation platforms targeting same-business-day settlement for pre-verified customers.

Section 4: Major Card Brand Considerations — Visa, Mastercard & Amex

4.1 Visa: The Evolving Framework for Digital Assets

Visa's engagement with the digital asset ecosystem has evolved from cautious observation to active framework-setting. Visa's 2024 rule changes marked a major turning point for the acceptance of digital currencies, establishing explicit standards for crypto and stablecoin transactions that have fundamentally shaped how C2C operators structure their services.

The key elements of Visa's current digital asset framework include: a requirement that every transaction include a transaction-level indicator specifying the type of digital asset (stablecoin, NFT, etc.); enhanced KYC, AML, CFT, and sanctions screening requirements for all crypto ramp providers; mandated pre-transaction disclosure and post-purchase receipts; and explicit rules governing disputes involving cryptocurrency purchases. In March 2024, Visa entered a strategic partnership with Western Union, including integration with Visa Direct and the delivery of value-added risk management services, with Western Union customers in select markets able to receive Visa prepaid cards — directly expanding the card-to-digital-asset pipeline.

For C2C operators, Visa-branded card acceptance requires MSB (Money Services Business) registration in the United States and equivalent licensing in other jurisdictions, demonstrated AML/KYC program adequacy, and compliance with Visa's Ramp Provider Program requirements for entities facilitating fiat-to-crypto conversion using Visa cards as funding sources.

4.2 Mastercard: Building the Crypto Corridor

Mastercard has pursued a similarly active strategy in the digital asset space, with particular emphasis on stablecoin settlement infrastructure. Mastercard's multi-token network initiative aims to enable financial institutions to use stablecoins for settlement — a development with direct implications for C2C transaction infrastructure, as it allows card-based value to flow more seamlessly into digital asset rails.

Mastercard's compliance requirements for digital asset-related card transactions align broadly with Visa's framework: enhanced due diligence for merchant category code (MCC) classification, explicit merchant agreement requirements for entities facilitating crypto conversion, and real-time sanctions screening. Mastercard's Crypto Secure program provides card issuers with fraud risk scoring specific to cryptocurrency-related merchant transactions, offering an additional layer of risk management that sophisticated C2C platforms can leverage to reduce chargeback exposure.

4.3 American Express: Premium Positioning in C2C

American Express cards command a premium position in the C2C market due to their association with higher-income, higher-balance card holders and corporate card programs. Amex-branded prepaid and gift cards are issued through the Amex prepaid network and carry the same network protections as standard Amex cards, including strong fraud liability protections for cardholders.

For C2C operators, Amex presents a distinct compliance profile. American Express operates as both a card network and a card issuer (in many markets), giving it tighter control over its acceptance ecosystem.

Amex's policies on card-to-crypto conversion are more restrictive than Visa/Mastercard in some jurisdictions, and operators must ensure explicit acceptance agreements are in place. However, the higher average card values of Amex products make compliance investment worthwhile — a single Amex corporate card conversion can represent significantly more value than multiple retail gift card transactions.

Table 4.1: Card Brand C2C Operational Comparison

Feature	Visa	Mastercard	Amex
C2C Policy Framework	Ramp Provider Program (2024)	Crypto Corridor Program	Case-by-Case / Network Agreement
Typical Card Value Range	\$5–\$500 (retail); higher corporate	\$5–\$500 (retail); higher corporate	\$25–\$2,000+ (corporate emphasis)
Chargeback Risk Level	Moderate	Moderate	Low–Moderate
Open-Loop C2C Suitability	Very High	Very High	High (with agreements)
KYC Threshold (suggested)	\$500 daily / \$10,000 enhanced	\$500 daily / \$10,000 enhanced	\$250+ recommended
Network Processing Fee (est.)	1.5–2.5%	1.5–2.5%	2.0–3.5%
Stablecoin Settlement Support	Visa Direct + Multi-Token	Multi-Token Network	Limited / Emerging
Geographic Coverage	200+ countries	210+ countries	150+ countries

4.4 Network Compliance Requirements — A Unified Framework

Across all three major card brands, C2C operators must satisfy a consistent set of network compliance requirements. Failure to comply does not merely risk regulatory sanction — it risks termination of card acceptance privileges, which constitutes an existential threat to a C2C platform.

- **MSB/VASP Registration:** Registration with FinCEN as a Money Services Business (U.S.) or equivalent VASP licensing in applicable jurisdictions is non-negotiable for all card network acceptance.
- **AML/KYC Program Documentation:** Written AML/KYC policies, procedures, and controls must be documented and available for review by card networks, regulators, and acquiring banks.
- **Suspicious Activity Reporting:** Mandatory SAR filing with FinCEN (U.S.) or equivalent bodies for transactions exhibiting characteristics of money laundering, fraud, or terrorist financing.
- **Transaction Monitoring:** Real-time or near-real-time monitoring systems capable of identifying unusual patterns, velocity anomalies, and structuring behavior across the full customer portfolio.
- **Record Retention:** Transaction records must be retained for a minimum of 5 years (U.S.) or as required by local law, with full auditability for regulatory examination.

Section 5: Stablecoins as the Bridge Asset

5.1 The Stablecoin Revolution in Numbers

The stablecoin market has undergone a transformation so rapid and so complete that its implications for C2C infrastructure are difficult to overstate. The market capitalization of the two largest stablecoins — Tether (USDT) and USD Coin (USDC) — has tripled since 2023, reaching a combined \$260 billion by end-2024. Trading volume reached \$23 trillion in 2024, a 90% increase year-on-year. Asia leads global stablecoin activity, but relative to GDP, Africa, the Middle East, and Latin America represent the highest-intensity adoption regions — precisely the markets where C2C-to-stablecoin conversion has the most transformative potential.

By April 2025, 26% of U.S. remittance users had adopted stablecoins for transactions. TRON leads stablecoin payment infrastructure with 70.46% of all USDT payments on major gateways. Binance Smart Chain follows at 63.76%. These network preferences are directly relevant to C2C operators, who must choose delivery networks that balance user accessibility, transaction finality, and network fees.

5.2 Why USDT Dominates C2C Output Preferences

Tether (USDT) has emerged as the dominant output asset for C2C transactions for several structural reasons:

- **Universal Exchange Acceptance:** USDT is accepted on virtually every major cryptocurrency exchange globally, giving recipients immediate optionality to convert to local fiat currency or other assets.
- **Multi-Network Availability:** USDT operates on Ethereum, TRON, BSC, Polygon, Solana, and other networks, allowing C2C operators to select the optimal delivery network for each customer's geography and wallet preferences.
- **Deep Liquidity:** USDT commands the deepest stablecoin liquidity pools globally, minimizing spread costs for operators who must hedge their stablecoin inventory against fiat payment flows.
- **Recognizability:** For customers in emerging markets, USDT has achieved brand-level recognition as "digital dollars," reducing the educational barrier to adoption that affects less-recognized stablecoins.

USD Coin (USDC) has gained traction particularly in regulated, institutional C2C contexts, due to its full-reserve attestation model, regulatory standing under MiCA (as an e-money token), and the compliance-forward posture of its issuer, Circle. For enterprise C2C platforms serving institutional clients or operating in heavily regulated jurisdictions, USDC may be preferred over USDT.

5.3 The Stablecoin Regulatory Environment — 2025–2026

The regulatory environment for stablecoins has crystallized dramatically and continues to evolve. The EU's MiCA framework has classified stablecoins into two categories — e-money tokens (EMTs) pegged 1:1 to a fiat currency, regulated from June 30, 2024, and asset-referenced tokens (ARTs) with more complex backing, regulated under additional rules. Both USDT and USDC-EUR have obtained or are seeking EMT designation in the EU, giving C2C operators regulatory clarity for European market operations.

In the United States, the GENIUS Act of 2025 is bringing stablecoin issuers under the Bank Secrecy Act, requiring mandatory KYC/AML/CFT compliance for any entity facilitating digital asset transfers, custody,

or issuance. The STABLE Act imposes reserve and capital requirements. While these legislative developments increase compliance costs, they simultaneously increase institutional confidence and will likely accelerate the institutional adoption of stablecoin infrastructure — including C2C platforms — that meets the new standards.

The Financial Action Task Force (FATF) Travel Rule now applies to virtually all stablecoin transfers above de minimis thresholds. As of 2025, 85 of 117 FATF member jurisdictions have passed or are actively implementing Travel Rule legislation for virtual assets, up from 65 in 2024. C2C operators must have Travel Rule compliance infrastructure in place to identify originator and beneficiary information for qualifying transfers, a significant operational requirement that favors well-capitalized, technology-forward platforms.

5.4 Bitcoin and Volatile Crypto as C2C Output Assets

While stablecoins dominate for remittance, financial access, and everyday utility use cases, Bitcoin and other volatile cryptocurrencies remain preferred output assets for investment-oriented C2C users. A 2025 survey found that 17% of Americans would prefer receiving crypto over a traditional gift card, with investment appreciation potential as the primary motivation.

C2C platforms offering volatile crypto output must implement additional risk disclosures and rate transparency mechanisms to manage the timing risk between conversion initiation and delivery. Some platforms address this through immediate market execution at initiation (with the fee reflecting execution costs rather than a settlement-window buffer), while others offer users a "lock rate" option at additional cost. Regulatory guidance in multiple jurisdictions requires that volatility risk be disclosed prominently and in plain language before transaction execution.

Section 6: Financial Inclusion & the Unbanked Imperative

6.1 The Scale of Financial Exclusion

The financial exclusion problem remains one of the most pressing challenges in global development. According to the World Bank and most recent estimates, approximately 1.4 billion adults worldwide remain unbanked — without access to a transaction account at a formal financial institution, mobile money operator, or payment service provider. This figure, while representing a decline from 1.7 billion in 2017, still encompasses a staggering proportion of the world's adult population.

The geographic distribution of financial exclusion is highly concentrated. In Southeast Asia, 70% of adults are unbanked or underbanked. In Sub-Saharan Africa, approximately 57% of adults lack bank accounts. South Asia, the Middle East, and parts of Latin America have significant underbanked populations. These regions share common barriers to financial access: physical distance from bank branches, documentation requirements (particularly for migrants and refugees), minimum balance requirements, high fees relative to income, and systemic discrimination against low-income and minority communities.

6.2 The Prepaid Card as the Unbanked's First Financial Instrument

Paradoxically, the unbanked are not absent from the prepaid card ecosystem — in many respects, prepaid cards are among their primary financial instruments. Government benefit disbursements, employer payroll cards, humanitarian aid distributions, and remittances received as gift card codes all route value to unbanked populations through prepaid card vehicles. The problem is not access to the card — it is the inability to extract that value into a form that is liquid, globally usable, and not restricted to a single merchant or geography.

This is precisely the gap that C2C platforms can fill. For an unbanked worker in Nigeria who receives a prepaid Mastercard as part of an employer incentive program, the ability to convert that card value to USDT — which can then be used for mobile payments, cross-border remittances, or local currency conversion through a crypto exchange — represents a qualitative transformation in financial capability. The 10–20% conversion fee, while significant, must be evaluated against the alternative: a card that can only be used at specific merchants, has an expiration date, and cannot be sent to family members abroad.

6.3 Stablecoins as Financial Inclusion Infrastructure

The role of stablecoins in advancing financial inclusion is now well-documented and actively acknowledged by international financial institutions. The IMF has recognized that stablecoins could drive innovation by increasing competition with established payment service providers, making retail digital payments more accessible to underserved customers in areas where it is costly or unprofitable for banks to serve. Several leading humanitarian organizations including the World Food Programme and UNHCR have already turned to dollar-denominated stablecoins to disburse aid to vulnerable populations.

The key advantage of stablecoins for financial inclusion is the minimal access requirement: all that is required is a mobile device with internet access and a digital wallet. No bank account, no credit history, no minimum balance, and — on many platforms — no complex identity documentation for small transactions. This access profile aligns almost perfectly with the characteristics of the target population for C2C financial inclusion use cases.

8.37% Average remittance cost for Sub-Saharan African corridors in 2024 — vs. 1–3% via stablecoin

\$16 Billion Estimated annual savings for remittance users if fees were reduced by 5 percentage points globally

45% Year-on-year cryptocurrency adoption growth rate in Africa (2023–2024), fastest globally

6.4 Case Studies — C2C as Financial Inclusion Engine

Case Study 6.1: The West African Gig Worker

A freelance software developer in Ghana is paid for remote work through a Visa prepaid card loaded by their U.S.-based employer. Without a U.S. bank account, they cannot deposit the card directly. Local ATM withdrawal options carry high fees and exchange rate losses. Through a C2C platform, they convert the card balance to USDT on TRON (near-zero network fee), retaining access to dollar-denominated value. They can then: pay for cloud services and software subscriptions in USDT; convert to Ghanaian cedi through a local crypto exchange; or send a portion directly to a family member in Nigeria without any international wire transfer fees.

Case Study 6.2: The Diaspora Remittance Sender

A Bangladeshi migrant worker in Qatar receives a Mastercard gift card as part of an employer Eid holiday bonus. Traditional wire transfer options to Bangladesh carry fees of 5–8% plus unfavorable exchange rates. Using a C2C platform, they convert the gift card to USDC, then transfer to a mobile wallet service in Bangladesh, where the recipient can convert to Bangladeshi taka through a local agent. Total effective cost: 12–15% (including C2C fee), but with universal accessibility, immediate availability, and no bank account required at either end.

Case Study 6.3: The Venezuelan Inflation Hedge

A Venezuelan professional receives a dollar-denominated gift card as payment for consulting work. Holding bolivar-denominated assets means instant inflation erosion. Converting the card to USDT through a C2C platform — even at a 15% fee — preserves dollar parity and inflation protection that no local financial instrument can match. The stablecoin balance can be stored, used for international online purchases, or converted to bolivars when needed at prevailing black market rates superior to official rates.

Section 7: Regulatory Landscape & Compliance Framework

7.1 The Global Regulatory Mosaic

C2C operators face a regulatory environment of extraordinary complexity, characterized by rapid evolution, significant cross-jurisdictional variation, and the convergence of multiple regulatory regimes — card network rules, money transmission law, virtual asset regulation, and AML/KYC requirements — that may each independently impose binding obligations.

The fundamental regulatory question for any C2C operator is: what type of entity are we? The answer varies by jurisdiction but typically involves one or more of the following classifications: Money Services Business (MSB) under FinCEN guidance (U.S.); Virtual Asset Service Provider (VASP) under FATF Recommendations and national implementing legislation; Electronic Money Institution (EMI) or Crypto-Asset Service Provider (CASP) under MiCA (EU); and Payment Institution or authorized agent under applicable national payment services law.

7.2 United States Regulatory Requirements

In the United States, C2C platforms are subject to a multi-layered federal and state regulatory framework:

- **FinCEN MSB Registration:** Any entity that exchanges currency (including convertible virtual currency) for value, or transmits value, is a Money Services Business under the Bank Secrecy Act. Registration with FinCEN is mandatory. FinCEN's 2024 enhanced requirements for MSBs mandate effective, risk-based AML/CFT programs approved by senior management, ongoing SAR and CTR reviews, and alignment with FinCEN's national AML/CFT priorities.
- **State Money Transmitter Licenses (MTLs):** In addition to federal MSB registration, most states require separate money transmitter licenses for businesses transmitting funds to or from residents. New York's BitLicense imposes the most stringent requirements, including a \$5,000 application fee, extensive compliance documentation, and ongoing regulatory examination. Operators must obtain MTLs in each state where they serve customers, a process that can take 12–18 months and cost \$500,000 or more in aggregate.
- **GENIUS Act & STABLE Act (2025):** These landmark stablecoin-specific laws bring stablecoin issuers and facilitators under BSA requirements, mandate KYC/AML/CFT compliance, and impose reserve requirements for stablecoin issuers. C2C platforms that receive stablecoins as payment or deliver stablecoins to customers must evaluate their obligations under these frameworks.
- **IRS Tax Reporting (2026 implementation):** Under new IRS rules taking effect in 2026, brokers — including crypto exchanges and potentially C2C platforms — will issue 1099-DA forms for covered transactions. C2C operators must implement cost basis tracking and be prepared to fulfill reporting obligations.

7.3 European Union — MiCA Compliance

The Markets in Crypto-Assets Regulation (MiCA), which fully came into force on December 30, 2024, represents the world's most comprehensive unified regulatory framework for digital assets. For C2C operators, MiCA's key implications are:

- **CASP Authorization:** Any entity providing crypto-asset services in the EU must obtain CASP authorization from a national competent authority. The authorization is passportable across EU member states, allowing a single authorization to support EU-wide operations — a significant advantage over the U.S. state-by-state licensing model.
- **Stablecoin Regulation:** USDT and USDC operating as e-money tokens (EMTs) must meet reserve requirements, complaint-handling standards, asset segregation requirements, and transparent risk disclosures. Non-compliant stablecoins may face restrictions or bans in EU markets.
- **Consumer Protection Requirements:** MiCA mandates pre-contractual disclosure of all fees, risks, and terms. The fee disclosure requirements are directly relevant to C2C operators, who must clearly and prominently disclose their 10–20% processing fee structure before transaction initiation.
- **DORA Compliance:** The Digital Operational Resilience Act, effective January 2025, imposes cybersecurity and operational resilience requirements on financial entities including CASPs. C2C platforms must demonstrate robust incident response, third-party risk management, and business continuity planning.

7.4 FATF Travel Rule — Global Implications

The FATF Travel Rule requires virtual asset service providers to collect, hold, and transmit specific originator and beneficiary information for qualifying virtual asset transfers. As of 2025, 85 of 117 FATF-member jurisdictions have passed or are implementing Travel Rule legislation. The rule requires:

- For transfers above the threshold (typically \$1,000 USD equivalent in the U.S.; €1,000 in EU): collection of full name, account number, and address or national identification number of the originator
- For transfers to non-VASP wallets (unhosted wallets): enhanced due diligence and, in many jurisdictions, verification of beneficial ownership
- Real-time transmission of this information to the receiving VASP simultaneously with the virtual asset transfer

Travel Rule compliance is a significant operational investment. Several technology solutions have emerged — including Notabene, Sygna, and Shyft — that provide Travel Rule messaging infrastructure for VASPs. C2C operators should budget for Travel Rule technology integration as a mandatory compliance cost rather than an optional enhancement.

7.5 Jurisdiction-Specific Availability Constraints

C2C service availability varies significantly by jurisdiction due to the intersection of multiple regulatory requirements. The following jurisdictions present the most significant operational constraints:

Jurisdiction	C2C Availability Status	Key Regulatory Constraint
United States	Available (with state MTLs)	State-by-state licensing; NY BitLicense required for NY users
European Union	Available (with MiCA CASP)	MiCA authorization required; stablecoin EMT rules apply
United Kingdom	Available (with FCA registration)	FCA crypto asset registration; AML Directive compliance
China (Mainland)	Effectively unavailable	Crypto trading and conversion largely prohibited
India	Restricted / Emerging	TDS on crypto transactions;

		evolving regulatory framework
Nigeria	Emerging / Regulated	SEC VASP registration required; banking restrictions lifted 2023
UAE / Dubai	Highly Favorable	VARA licensing framework; crypto hub designation
Singapore	Available (with MAS License)	MAS Payment Services Act; PSP licensing required
Brazil	Emerging	BACEN/CVM regulatory framework in development
OFAC-Sanctioned States	Prohibited	OFAC compliance; no service to sanctioned persons/entities

Section 8: Technology Architecture & Infrastructure

8.1 The Enterprise C2C Technology Stack

Building a compliant, scalable enterprise C2C platform requires integrating multiple technology layers that span traditional financial infrastructure (card networks, banking rails) and crypto-native infrastructure (blockchains, wallets, exchanges). The architecture must simultaneously satisfy the real-time processing requirements of crypto markets and the compliance documentation requirements of financial regulators.

Layer 1: Customer Interface and Onboarding

The customer-facing layer must deliver a frictionless user experience while collecting all required KYC/AML data. State-of-the-art C2C platforms deploy mobile-first interfaces with integrated biometric verification, document scanning (OCR and ML-powered identity document verification), and liveness detection to satisfy identity verification requirements in real time. Progressive profiling — collecting minimal data for small transactions and escalating requirements for larger ones — balances user experience with compliance rigor.

Wallet address input is a critical UX design challenge. The irreversibility of cryptocurrency transfers means that address input errors constitute an absolute loss. Best-practice C2C platforms implement multi-stage address verification: checksum validation, network compatibility checking, and explicit user confirmation of the destination address with a copy of the address displayed in large font.

Layer 2: Card Verification and Processing

The card processing layer interfaces with Visa, Mastercard, and Amex networks through acquiring bank relationships or payment processor APIs. Key components include:

- Card balance verification APIs (real-time or near-real-time balance checking through network APIs or processor integration)
- Fraud screening integration (using tools such as Kount, Signifyd, or network-provided fraud scoring services)
- Transaction processing gateway (payment facilitator or acquiring bank relationship for authorized card charges)
- Chargeback management system (automated dispute response workflows, evidence collection, and escalation protocols)

Layer 3: Compliance and Risk Engine

The compliance layer is the most technically sophisticated and operationally critical component of the C2C stack. It must execute in near-real-time while maintaining comprehensive audit trails:

- KYC Orchestration: Integration with identity verification providers (e.g., Jumio, Onfido, Persona) for document verification, biometric matching, and database cross-referencing
- Sanctions Screening: Real-time screening against OFAC SDN lists, UN Consolidated Sanctions List, EU Asset Freeze Lists, and PEP (Politically Exposed Person) databases using providers such as Chainalysis, Elliptic, or TRM Labs
- AML Transaction Monitoring: Behavioral analytics and rule-based systems that flag structuring behavior, velocity anomalies, and patterns indicative of money laundering or fraud

- Travel Rule Engine: Integration with Travel Rule messaging networks (Notabene, Sygna) for compliant VASP-to-VASP information transfer on qualifying transactions
- SAR Filing Infrastructure: Automated case management tools for SAR preparation, review, and filing with FinCEN or equivalent regulatory body

Layer 4: Crypto Execution and Delivery

The crypto execution layer handles the conversion of fiat value (received from card processing) into cryptocurrency and its delivery to the customer's wallet. Key components:

- Exchange Integration: API connections to major cryptocurrency exchanges (Coinbase, Kraken, Binance) or OTC desks for efficient fiat-to-crypto conversion
- Multi-Network Wallet Infrastructure: Non-custodial or custodial wallet infrastructure capable of executing transactions on multiple blockchain networks (TRON, BSC, Ethereum, Polygon) with network selection based on cost and speed optimization
- Hot/Cold Wallet Management: Security-optimized wallet architecture with the majority of customer delivery funds held in cold storage and a working capital hot wallet for transaction execution
- Transaction Monitoring: Blockchain analytics integration (Chainalysis, TRM Labs) for post-delivery monitoring of wallet activity, enabling detection of funds flowing to sanctioned addresses or mixing services

8.2 Blockchain Network Selection — The Critical Operational Decision

Table 8.1: Blockchain Network Comparison for C2C Stablecoin Delivery

Network	Avg. Fee (USDT Transfer)	Settlement Time	C2C Suitability	Notes
TRON (TRC-20)	\$0.001–0.10	< 60 seconds	★★★★★	70.46% USDT payment share; dominant for C2C
BSC (BEP-20)	\$0.05–0.30	3–5 seconds	★★★★☆	63.76% USDT share; strong wallet support
Polygon (PoS)	\$0.001–0.05	2–5 seconds	★★★★☆	Low cost; growing adoption
Solana	\$0.0001–0.01	< 1 second	★★★★☆	Ultra-low cost; high throughput
Ethereum (ERC-20)	\$2–\$50+	12 seconds–5 min	★★☆☆☆	20.79% USDT share; high fees limit C2C use
Bitcoin (Lightning)	Near-zero	< 5 seconds	★★★☆☆	BTC output only; growing infrastructure

Network selection is a critical operational and commercial decision. TRON's dominance for USDT delivery in C2C contexts reflects its combination of near-zero transaction fees, fast finality, and deep integration with major exchanges and wallets in emerging markets. However, operators must maintain multi-network capability to serve customers whose preferred exchanges or wallets support specific networks.

Section 9: Risk Management & Fraud Mitigation

9.1 The Fraud Landscape — Threats Specific to C2C

The C2C sector operates at the intersection of two high-risk financial categories: prepaid card fraud and cryptocurrency fraud. The combination creates a threat environment of unusual complexity and sophistication. The FTC reports that investment and imposter scams drained \$1.4 billion from crypto users in 2024, with fraudulent gift card-to-crypto conversion schemes representing a growing component. The estimated volume of cryptocurrencies used in illicit activities reached \$51.3 billion in 2024 according to blockchain analytics firms.

Since 2022, stablecoins have overtaken Bitcoin as the asset of choice among criminals using crypto, accounting for approximately 63% of all illicit transactions in 2024. This fact underscores the compliance imperative for stablecoin-focused C2C platforms: without robust controls, C2C infrastructure can become a conduit for the laundering of card fraud proceeds.

9.2 Primary Fraud Vectors in C2C Transactions

- **Stolen Card Fraud:** Cards obtained through data breaches, skimming, phishing, or physical theft. Stolen open-loop cards are particularly attractive for C2C fraud because crypto conversion provides rapid, irreversible laundering. Mitigation requires real-time integration with card issuer fraud databases and behavioral velocity monitoring.
- **Gift Card Scam Victim Conversions:** A significant portion of C2C volume in some markets involves victims of social engineering scams who have been instructed to purchase gift cards and convert them to crypto as "payment." C2C platforms have a legal and ethical obligation to identify and block these transactions. Red flags include rushed behavior, large initial conversion amounts, customer statements suggesting external instruction, and patterns consistent with IRS, utility, or romance scam scripts.
- **Account Takeover (ATO):** Fraudsters who gain access to a verified C2C account through credential theft, SIM swapping, or social engineering. Mitigation requires multi-factor authentication, device fingerprinting, behavioral biometrics, and step-up verification for high-value or unusual transactions.
- **Chargeback Fraud (Friendly Fraud):** Customers who convert legitimate card balances to crypto and then dispute the original card transaction with the issuer. Because crypto transactions are irreversible, the C2C platform bears the loss in a successful chargeback. Mitigation requires explicit written customer agreement to transaction terms, robust documentation of card verification and customer consent, and chargeback reserve management.
- **Money Mule Networks:** Organized criminal networks using multiple accounts across multiple platforms to structure card-to-crypto conversions below reporting thresholds. FATF has specifically flagged structuring in C2C contexts as an emerging AML typology.
- **Wallet Address Substitution:** Sophisticated attacks where malware on the customer's device substitutes the destination wallet address with an attacker-controlled address. Mitigation requires in-app address input (rather than clipboard paste), address confirmation UX with prominent visual display, and customer education.

9.3 The "Wallet Address Accuracy" Problem — Operator Liability and Best Practices

CRITICAL: Once a cryptocurrency transaction is broadcast to the blockchain and confirmed, it is irreversible. Customers are solely responsible for providing accurate wallet addresses. Service providers bear no liability for funds sent to incorrect addresses. This is the single most important risk disclosure in the C2C customer relationship.

The irreversibility of cryptocurrency transactions means that wallet address errors — whether through typo, clipboard substitution, or network mismatch — result in permanent, unrecoverable loss of funds. C2C platforms that aspire to long-term reputational sustainability must engineer their customer experience specifically to minimize this risk, even though operator liability for address errors is effectively zero under current legal frameworks.

Best practices for wallet address accuracy: Require manual re-entry (not copy-paste) for first-time addresses. Display the full destination address prominently and require explicit confirmation. Validate checksum before processing (catches most typos). Verify network compatibility (TRON USDT sent to Ethereum USDT address is irrecoverable). For high-value transactions, implement callback verification (phone or email confirmation with address re-display). Maintain a customer education program that clearly explains address finality before first transaction.

9.4 C2C-Specific AML Typologies and Response Framework

FinCEN and international AML bodies have identified specific transaction patterns in C2C contexts that merit heightened scrutiny:

AML Typology	Transaction Pattern	Recommended Response
Smurfing / Structuring	Multiple sub-threshold transactions by same customer or linked group	Velocity monitoring; aggregate reporting; SAR filing
Round-Trip Laundering	Card → crypto → exchange → fiat → card (circular pattern)	Blockchain analytics; transaction chain analysis; account review
Scam Victim Conversion	Large initial transaction; customer expressions of urgency or external instruction	Friction intervention; verbal confirmation; delay and review protocol
Layered Entity Fraud	B2B account with multiple card sources, rapid conversion, single wallet destination	Enhanced B2B KYB; beneficial ownership verification; source of funds
Sanctioned Entity Access	Transactions from OFAC-designated jurisdictions via VPN masking	IP geolocation + VPN detection; sanctions screening on wallet addresses

Section 10: Business Models & Revenue Structures

10.1 The C2C Revenue Ecosystem

The C2C sector supports multiple distinct business models, each with different risk profiles, regulatory requirements, capital intensities, and addressable markets. Understanding the full range of revenue structures is essential for entrepreneurs, investors, and institutional partners evaluating entry strategies.

10.2 Direct C2C Exchange Platform

The foundational C2C business model is the direct exchange platform: the platform accepts card submissions from consumers, processes the card value, and delivers cryptocurrency to the customer's wallet, retaining a processing fee of 10–20%. Revenue is generated on transaction spread. This model requires:

- MSB/VASP licensing in operating jurisdictions
- Acquiring bank relationship for card processing
- KYC/AML infrastructure and ongoing compliance costs
- Crypto inventory management and exchange relationships
- Fraud reserve capital (typically 2–5% of transaction volume on a rolling basis)

Unit economics are highly sensitive to fraud rate and chargeback rate. A platform processing \$10 million in monthly card volume at a 15% fee generates \$1.5 million gross revenue. After deducting card processing fees (2%), compliance costs (1%), fraud reserves (3%), and operating costs (5%), net margin is approximately 4%, or \$400,000 monthly. Scale is the primary driver of profitability, as fixed compliance and technology costs are amortized over a larger volume base.

10.3 Enterprise B2B C2C Services

The enterprise B2B model targets large-scale card issuers, corporate incentive program operators, and fintech platforms that need C2C functionality embedded in their existing services. Rather than serving consumers directly, the B2B C2C platform provides API-based conversion services as white-label infrastructure.

Revenue is generated through per-transaction fees (typically 5–12% for enterprise accounts, reflecting lower fraud rates and higher volumes) and monthly platform licensing fees. The B2B model has significantly lower customer acquisition costs, lower fraud exposure (enterprise customers have pre-verified identities), and higher barriers to entry due to the lengthy enterprise sales cycle and integration requirements. It is the preferred model for well-capitalized entrants seeking institutional-quality business relationships.

10.4 The Closed-Loop Gift Card Exchange Market

A parallel market has emerged for the exchange of closed-loop retail gift cards (Amazon, Walmart, Target, etc.) for cryptocurrency. This market operates on a secondary market model: the C2C platform either purchases the card at a discount (typically 10–30% below face value depending on brand) and resells it, or acts as a marketplace connecting card sellers with buyers.

This segment carries distinct risk characteristics. Closed-loop card fraud rates are higher than open-loop, as retail gift card codes are more easily stolen, cloned, or fabricated. Platforms operating in this space must invest heavily in real-time card balance verification, brand-specific fraud pattern detection, and typically hold cards for a verification period before delivering crypto — a model that creates inventory risk but reduces fraud exposure.

10.5 Revenue Projections — Market Sizing for C2C

Table 10.1: C2C Market Revenue Opportunity — 5-Year Projection

Year	Total Addressable Market (Card Volume)	Est. C2C Penetration Rate	C2C Converted Volume	Revenue at 15% Avg Fee
2025	\$292 Billion (Gift Cards)	0.1%	\$292 Million	\$43.8 Million
2026	\$315 Billion	0.25%	\$787 Million	\$118 Million
2027	\$340 Billion	0.5%	\$1.7 Billion	\$255 Million
2028	\$368 Billion	0.8%	\$2.9 Billion	\$440 Million
2029	\$397 Billion	1.2%	\$4.8 Billion	\$712 Million
2030	\$428 Billion	1.8%	\$7.7 Billion	\$1.15 Billion

Note: This projection covers the gift card segment only, representing the most conservative estimate. Including all prepaid card categories (GPR, payroll, government benefit) at the broader \$5.4 trillion market level would result in revenue projections an order of magnitude larger at equivalent penetration rates. The 1.8% penetration rate by 2030 represents a modest adoption target given the structural advantages of C2C for financial inclusion and the tailwinds from stablecoin adoption.

Section 11: Global Market Adoption Roadmap

11.1 Market Prioritization Framework

Not all markets present equal opportunity for C2C adoption. A rigorous market prioritization framework must consider four dimensions: prepaid card market size and growth rate, cryptocurrency and stablecoin adoption level, regulatory accessibility for C2C operations, and unbanked population density and demand for financial inclusion tools. The intersection of these factors produces a market opportunity matrix that guides global expansion sequencing.

Table 11.1: Global C2C Market Opportunity Matrix

Region	Prepaid Card Market	Crypto Adoption	Regulatory Climate	C2C Priority
USA / Canada	★★★★★	★★★★☆	★★★☆☆ (complex)	TIER 1 — Lead Market
EU (ex-UK)	★★★★☆	★★★★☆	★★★★★ (MiCA clarity)	TIER 1 — Lead Market
United Kingdom	★★★★☆	★★★★☆	★★★★☆ (FCA regime)	TIER 1 — Lead Market
UAE / GCC	★★★☆☆	★★★★★	★★★★★ (VARA hub)	TIER 1 — High Priority
Southeast Asia	★★★☆☆	★★★★★	★★★☆☆ (variable)	TIER 2 — Growth Market
Sub-Saharan Africa	★★☆☆☆	★★★★★	★★☆☆☆ (emerging)	TIER 2 — Inclusion Focus
Latin America	★★★☆☆	★★★★☆	★★★☆☆ (variable)	TIER 2 — Growth Market
India	★★★★☆	★★★☆☆	★★☆☆☆ (restrictive)	TIER 3 — Watch
China (Mainland)	★★★★★	★☆☆☆☆	☆☆☆☆☆ (prohibited)	NOT VIABLE
Australia / NZ	★★★☆☆	★★★★☆	★★★★☆	TIER 2 — Growth Market

11.2 Phased Market Entry Strategy

Phase 1 (2025–2026): Establish Compliant Infrastructure in Lead Markets

The initial phase of C2C market development should focus on establishing the regulatory and operational infrastructure necessary to serve the three highest-opportunity markets: USA, EU, and UAE. These markets offer the clearest regulatory frameworks, the largest concentrations of open-loop prepaid card value, and the most sophisticated institutional partner ecosystems. Obtaining MSB registration (USA), CASP authorization (EU), and VARA licensing (UAE) in the first phase creates the compliance foundation that can be extended to other markets through regulatory passport or bilateral agreements.

Phase 2 (2026–2027): Financial Inclusion Markets — Africa, Southeast Asia, and LatAm

The second phase focuses on high-impact financial inclusion markets where the unbanked demand for C2C services is highest and where stablecoin adoption is already advanced. Sub-Saharan Africa — with

57% unbanked adults, 45% cryptocurrency adoption growth, and major remittance inflows — represents a defining opportunity. Southeast Asia, with 70% unbanked or underbanked adults and mobile-first digital infrastructure, offers similar potential. Latin America combines high remittance volumes with strong stablecoin adoption driven by inflationary pressures in major economies.

Phase 3 (2027–2030): Mainstream Adoption and Enterprise Integration

The third phase involves the mainstreaming of C2C as a standard feature of the broader payments ecosystem. This phase is characterized by integration of C2C APIs into major digital wallets, banking apps, and corporate expense management platforms; the emergence of C2C as a B2B2C service delivered through institutional distribution channels; and the potential for card network-native C2C functionality as Visa and Mastercard deepen their digital asset frameworks. By 2030, C2C may no longer be a specialized fintech service — it may be a feature of every major digital wallet application globally.

11.3 Africa as the C2C Breakthrough Market

Africa deserves specific analysis as the market where C2C may have its most transformative impact. According to Chainalysis data, Africa is the fastest-growing region for cryptocurrency adoption globally, with a year-on-year growth rate of 45% from 2023 to 2024, surpassing Latin America at 42.5%. Sub-Saharan Africa remains the region with the highest remittance costs globally, with an average remittance cost of 8.37% in 2024 — making stablecoin-based solutions, including C2C, highly attractive on economic grounds alone.

The December 2023 lifting of the Central Bank of Nigeria's ban on banks providing services to cryptocurrency companies has opened significant institutional pathways for C2C platform development in Africa's largest economy. Nigeria's SEC launched the Accelerated Regulatory Incubation Program in June 2024, providing a regulatory pathway for VASP registration. Similar developments are occurring across Kenya, Ghana, South Africa, and Rwanda, each of which is developing crypto-asset regulatory frameworks that create legitimate operating environments for C2C platforms.

Section 12: Competitive Landscape

12.1 Market Structure — From Peer-to-Peer Roots to Enterprise Platforms

The C2C market has evolved from informal peer-to-peer gift card exchanges on forums and platforms like LocalBitcoins and Paxful toward increasingly professionalized, compliance-focused enterprise platforms. This evolution reflects both the maturation of the crypto industry and the increasing regulatory scrutiny that has raised the barrier to entry for credible operators.

The current competitive landscape can be segmented into four tiers, each with distinct operational profiles, regulatory postures, and target markets:

Tier 1: Specialist C2C Exchange Platforms

These platforms — including Prepaid2Coin, Coinstar Exchange (in partnership with crypto services), and several emerging fintech entrants — are purpose-built for card-to-crypto conversion. They offer the most comprehensive brand coverage (Visa, Mastercard, Amex), competitive fee structures (often at the 10–15% range for open-loop cards), and user experiences optimized for the C2C use case. Leading Tier 1 platforms have invested significantly in KYC/AML infrastructure, fraud prevention, and multi-network crypto delivery. Prepaid2Coin, as one example, allows daily sales up to \$500 at basic verification and limit increases up to \$10,000 for trusted customers — a tiered model that reflects best-practice KYC implementation.

Tier 2: Peer-to-Peer Marketplace Platforms

Platforms like Paxful, LocalCryptos, and regional equivalents create marketplaces where gift card sellers and crypto buyers are matched. The platform earns a listing or transaction fee (typically 1–5% from the seller side) without taking the card fraud risk directly — that risk falls on the buyer. These platforms have historically operated with lower compliance standards, a factor that has resulted in significant regulatory action against some operators, but next-generation P2P platforms are investing heavily in compliance to address this issue.

Tier 3: Crypto Exchange C2C Features

Major cryptocurrency exchanges including Coinbase, Binance, and Kraken have either launched or are developing gift card-to-crypto conversion features as part of broader fiat on-ramp services. Their competitive advantages are brand trust, user base scale, and deep crypto liquidity. Their disadvantages are less specialized UX for card-specific workflows and typically higher effective fees when all exchange costs are included. However, exchange integration of C2C functionality could significantly accelerate mainstream adoption by exposing the service to hundreds of millions of existing exchange users.

Tier 4: Retail and Fintech Ecosystem Integrations

Retail kiosk networks (Coinstar, Bitcoin Depot) and fintech applications (Cash App, PayPal) are beginning to offer card-adjacent crypto acquisition services, though not always through direct card conversion. As Visa and Mastercard continue to develop their digital asset infrastructure — including Visa Direct for stablecoin delivery and Mastercard's Multi-Token Network — the potential for card network-native C2C functionality becomes more realistic.

12.2 Key Competitive Differentiators

In a market where all players process similar card types at similar fee levels, competitive differentiation occurs on five dimensions:

- **Processing Speed:** First-mover advantage in accelerating the 1–3 business day standard to same-business-day or faster settlement for pre-verified customers. Every hour of processing time reduction represents improved user experience and lower conversion abandonment.
- **Geographic Coverage:** The ability to serve customers in more jurisdictions, including financial inclusion markets in Africa and Southeast Asia, represents a significant competitive moat as these markets scale.
- **Brand Coverage:** The breadth of card brands, networks, and closed-loop retail cards supported. A platform that can convert a Starbucks gift card alongside a Visa prepaid card offers superior user utility.
- **Fee Competitiveness at Scale:** Enterprise C2C operators who achieve sufficient volume to negotiate preferential card processing rates and exchange liquidity can pass cost savings to customers, creating a virtuous cycle of volume and competitiveness.
- **Compliance Quality:** Paradoxically, compliance quality is becoming a competitive differentiator as regulators increase scrutiny. Platforms with verifiably robust AML/KYC programs are able to maintain card network relationships and institutional partnerships that less-compliant competitors cannot access.

Section 13: Strategic Recommendations

13.1 For C2C Platform Operators

STRATEGIC IMPERATIVE: Build compliance as infrastructure, not overhead. The regulatory frameworks of 2025–2026 have permanently elevated the minimum viable compliance standard. Platforms that treat AML/KYC as a cost center rather than a competitive asset will be displaced by those that recognize compliance excellence as the foundation of sustainable C2C business.

Recommendation 1: Invest in Compliance Technology Before Scale

The historical pattern of "grow first, comply later" has proven catastrophic for crypto financial services: Binance's \$4.3 billion resolution, Coinbase's \$100 million settlement, and multiple exchange shutdowns all trace to compliance deficiencies that grew in tandem with the business. C2C operators should invest in enterprise-grade KYC orchestration, transaction monitoring, and Travel Rule infrastructure from inception, treating these as foundational capabilities rather than future add-ons. The cost of proper compliance infrastructure at founding is a fraction of the cost of remediation at scale.

Recommendation 2: Prioritize Stablecoin Output and Communicate It

Market research and adoption data consistently show that stablecoins — particularly USDT and USDC — are the optimal output asset for the vast majority of C2C use cases. Operators should make stablecoin output the default and primary offering, with volatile crypto as an opt-in for explicitly investment-oriented users. This positioning reduces conversion-timing risk, simplifies fee communication, and aligns with the dominant use cases (remittance, financial access, inflation protection) that drive C2C demand.

Recommendation 3: Design for the Unbanked from Day One

Financial inclusion is not merely a social obligation for C2C operators — it is a commercial opportunity of enormous scale. Designing user experiences that minimize documentation requirements for small transactions, offer multilingual interfaces, support SMS-based wallet verification for users without smartphones, and provide in-app education about cryptocurrency and wallet security will unlock the 1.4 billion unbanked adults who represent the long-term growth engine of the C2C market.

Recommendation 4: Build for Enterprise, Deliver to Consumer

The most capital-efficient growth strategy for C2C platforms is a B2B2C model: develop enterprise API capabilities that can be integrated into existing financial service platforms, remittance companies, mobile wallet apps, and corporate expense management systems, which then deliver C2C functionality to their end users. This model dramatically reduces customer acquisition costs, leverages existing trust relationships between enterprises and their users, and creates recurring revenue from institutional clients with lower fraud exposure than direct consumer operations.

Recommendation 5: Geographic Sequencing Based on the Opportunity Matrix

Operators should resist the temptation to pursue global coverage simultaneously. A disciplined geographic sequencing — establishing deep compliance infrastructure and strong market position in Tier 1 markets before expanding to Tier 2 — allows the platform to build operating expertise, generate

revenue for expansion investment, and demonstrate regulatory credibility that will facilitate licensing in new jurisdictions.

13.2 For Card Networks (Visa, Mastercard, Amex)

Card networks stand at a strategic crossroads in the C2C ecosystem. They currently represent an enabling layer — their branded cards are the input asset in C2C transactions — but as stablecoin infrastructure matures, they face the risk of disintermediation if card-to-crypto conversion migrates to off-network pathways.

- Develop explicit C2C partner programs that provide certified operators with preferential processing rates, fraud data sharing, and regulatory navigation support in exchange for compliance standards adherence. This positions the card networks as the infrastructure backbone of legitimate C2C rather than a passive participant.
- Invest in stablecoin settlement infrastructure that makes card networks the preferred delivery channel for crypto output, not just card input. Visa Direct's stablecoin capabilities and Mastercard's Multi-Token Network are steps in this direction; accelerating these investments will cement card network relevance in the Web3 economy.
- Establish clear, transparent acceptance criteria for C2C merchant category codes to reduce compliance uncertainty for operators and create a level playing field that rewards the most compliant platforms.

13.3 For Regulators and Policymakers

The regulatory community faces a fundamental choice in the C2C sector: over-restrict and drive C2C activity to less regulated jurisdictions and informal channels, where consumer protection is lowest and illicit activity is highest; or establish clear, workable frameworks that bring C2C activity into the regulated perimeter, enabling effective AML/KYC oversight while preserving the financial inclusion benefits that legitimate C2C delivers.

- Adopt risk-based AML/KYC thresholds that recognize the financial inclusion value of small-value C2C transactions, reducing identity verification requirements for transactions below \$250 while maintaining full KYC requirements above this threshold.
- Develop proportionate licensing frameworks for C2C operators that are more accessible to fintech startups than current MSB/MTL requirements allow, particularly for platforms focusing on financial inclusion use cases.
- Engage with international standard-setting bodies (FATF, BIS, FSB) to develop C2C-specific guidance that acknowledges the unique compliance profile of card-to-crypto conversion and distinguishes it from higher-risk crypto activities.
- Support financial literacy programs that educate unbanked populations about cryptocurrency security, particularly wallet address management and protection against social engineering scams that exploit C2C platforms.

Section 14: Future Outlook — The Next Five Years

14.1 Three Scenarios for C2C in 2030

Scenario A: The Mainstream Integration Scenario (Base Case — 65% Probability)

In the base case, C2C evolves from a specialist fintech service to a mainstream feature of the broader digital payments ecosystem. Card networks deploy native C2C functionality within their own digital wallets and partner apps. Major remittance companies embed C2C APIs as a standard service offering. Mobile money operators across Africa and Southeast Asia offer card-to-stablecoin conversion as a primary on-ramp. By 2030, C2C conversion is as unremarkable as international wire transfer — available everywhere, with competitive fees, and compliant with universally adopted regulatory standards. The 10–20% fee compresses to 5–10% as competition intensifies and compliance infrastructure costs are amortized at scale. Annual C2C converted volume reaches \$50–75 billion globally.

Scenario B: The Financial Inclusion Breakthrough Scenario (Optimistic — 20% Probability)

In the optimistic scenario, C2C becomes a defining instrument of the global financial inclusion movement. International development organizations including the World Bank, IMF, and UNHCR formally endorse stablecoin-based C2C as a financial inclusion infrastructure tool and provide capacity-building support for regulatory frameworks in developing markets. Card network partnerships with major humanitarian organizations create direct pipelines for card-to-stablecoin conversion for benefit recipients. The 1.4 billion unbanked adults gain meaningful access to dollar-denominated financial services through C2C pathways, contributing to measurable reductions in global poverty metrics. Annual C2C converted volume reaches \$200 billion or more by 2030, with financial inclusion markets representing 40% of volume.

Scenario C: The Regulatory Constraint Scenario (Downside — 15% Probability)

In the downside scenario, a major C2C-enabled financial scandal — whether a large-scale fraud event or a high-profile money laundering case — triggers a regulatory overreaction that imposes prohibitive compliance costs or outright restrictions on C2C services in key markets. Card networks, facing reputational risk, terminate acceptance agreements with all but the most institutionally credentialed C2C operators. The market fragments into a small number of large, compliant platforms serving institutional clients and a larger ecosystem of informal, unregulated services serving the mass market. Financial inclusion benefits are substantially reduced. Annual C2C converted volume plateaus below \$20 billion globally.

14.2 Technology Inflection Points That Will Shape C2C

- **AI-Powered Fraud Prevention:** Machine learning models trained on cross-platform fraud data will dramatically reduce the fraud rate on C2C transactions, compressing the fraud reserve component of processing fees and making C2C economically viable at lower fee levels. By 2027, AI-powered fraud detection is expected to reduce C2C fraud losses by 60–80% from 2025 levels.
- **Central Bank Digital Currencies (CBDCs):** The emergence of CBDCs in major economies — including potential USD CBDC or Federal Reserve Digital Dollar initiatives — could either complement or compete with stablecoin-based C2C. If CBDCs offer programmable, instant, low-cost settlement, they may become the preferred output asset for C2C platforms in CBDC-adopting jurisdictions, potentially

displacing private stablecoins. Operators must monitor CBDC developments closely and build flexible crypto delivery infrastructure.

- **Cross-Chain Interoperability:** The maturation of cross-chain bridge technology and interoperability standards will allow C2C operators to deliver output assets across any supported blockchain network, eliminating the current fragmentation between TRON, BSC, Ethereum, and other networks. This simplifies both user experience and operator inventory management.
- **Biometric Digital Identity:** The global rollout of biometric digital identity systems — including India's Aadhaar, the EU's eIDAS 2.0, and emerging equivalents in Africa — will dramatically reduce KYC costs and processing times for C2C platforms. Real-time, globally interoperable biometric identity verification will eventually compress the KYC component of C2C fees to near-zero.
- **Embedded Finance and API Economy:** As financial services increasingly move to API-based infrastructure, C2C functionality will be embedded seamlessly into a wider range of applications: gig economy payout platforms, HR and payroll systems, corporate expense management tools, and consumer apps. This embedded model will multiply C2C touchpoints by orders of magnitude without requiring consumer-facing C2C platform marketing.

14.3 The Long-Term Vision — C2C as Global Financial Plumbing

The ultimate trajectory for Card-to-Crypto conversion is from a specialized, fee-intensive service to an invisible piece of global financial infrastructure — a background conversion layer that allows value to move seamlessly between the card ecosystem and the crypto ecosystem in the same way that FX conversion happens automatically in the background of international transactions today.

When that vision is realized, a domestic care worker in the Philippines who receives a Mastercard prepaid card as part of an employer wellness program will have their card balance automatically available in their mobile stablecoin wallet, ready to use for remittances to family in Mindanao, payment for online education, or investment in a mobile savings account — all without any manual conversion step or awareness of the underlying C2C infrastructure that made it possible.

"The most successful technology becomes invisible. The future of Card-to-Crypto is not a service that users consciously choose — it is the infrastructure layer that makes cards and crypto the same thing."

Appendices

Appendix A: Glossary of Key Terms

Account Funding Transaction (AFT): A card network transaction type used to load funds from a card to another account, including crypto wallets, as defined in Visa's and Mastercard's rules for digital asset ramp providers.

AML (Anti-Money Laundering): Laws, regulations, and procedures designed to prevent criminals from disguising illegally obtained funds as legitimate income. C2C platforms are subject to AML requirements as Money Services Businesses.

CASP (Crypto-Asset Service Provider): Under MiCA, any entity that provides crypto-asset services in the European Union must obtain CASP authorization from a national competent authority.

C2C (Card-to-Crypto): The process of converting prepaid card value — including gift cards, prepaid debit cards, and open-loop network cards — into cryptocurrency or digital assets.

Closed-Loop Gift Card: A prepaid card restricted to use at a specific retailer or chain, such as an Amazon or Starbucks gift card. Not bearing a major network brand.

FATF Travel Rule: FATF Recommendation 16, requiring VASPs to share originator and beneficiary information for qualifying virtual asset transfers, analogous to the wire transfer rules for traditional financial institutions.

GENIUS Act: U.S. legislation passed in 2025 bringing stablecoin issuers under the Bank Secrecy Act with mandatory KYC/AML/CFT requirements.

GPR Card (General Purpose Reloadable): An open-loop prepaid card that can be reloaded with funds, typically used as a banking substitute for the unbanked and underbanked.

KYC (Know Your Customer): Identity verification processes mandated for financial service providers, including customer identification, due diligence, and ongoing monitoring.

MiCA (Markets in Crypto-Assets Regulation): The EU's comprehensive regulatory framework for crypto-assets and crypto-asset service providers, fully effective December 30, 2024.

MSB (Money Services Business): A FinCEN-defined category of financial entities in the U.S., including currency exchangers and money transmitters. C2C platforms operating in the U.S. are typically classified as MSBs.

Open-Loop Card: A prepaid card bearing a major network brand (Visa, Mastercard, Amex) that can be used at any merchant accepting that network.

Stablecoin: A cryptocurrency designed to maintain a stable value relative to a reference asset, typically the U.S. dollar. USDT and USDC are the leading stablecoins by market capitalization.

USDC (USD Coin): A fully-reserved U.S. dollar stablecoin issued by Circle, regulated as an e-money token under MiCA in the EU.

USDT (Tether): The largest stablecoin by market capitalization and trading volume, widely used for C2C output delivery, particularly in emerging markets.

VASP (Virtual Asset Service Provider): FATF's regulatory classification for entities providing services related to virtual assets, including crypto exchanges, stablecoin issuers, and C2C conversion platforms.

Wallet Address: The unique cryptographic identifier that functions as the destination for a cryptocurrency transaction. Errors in wallet address are irreversible and result in permanent loss of funds.

Appendix B: Key Data Sources & References

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Appendix C: Regulatory Checklist for C2C Platform Launch

The following checklist represents the minimum regulatory compliance milestones required for a C2C platform launch in the United States and European Union. This checklist is illustrative only and does not constitute legal advice. Legal counsel specializing in financial services regulation should be engaged for jurisdiction-specific guidance.

PRE-LAUNCH COMPLIANCE

- Engage financial services legal counsel specializing in MSB/VASP/crypto asset regulation
- Conduct comprehensive AML/KYC risk assessment covering all product lines, customer segments, and geographies
- Draft and adopt written AML/KYC Policy, Procedures, and Controls document, approved by senior management/board
- Register with FinCEN as Money Services Business (USA)
- Apply for state Money Transmitter Licenses in all target states (USA)
- Obtain MiCA CASP authorization from national competent authority (EU)
- Designate AML Compliance Officer (required by BSA and MiCA)
- Implement KYC identity verification platform (Jumio, Onfido, or equivalent)
- Integrate sanctions screening against OFAC SDN, UN, and EU lists
- Establish card processing acquiring bank relationship and merchant agreement
- Implement blockchain analytics tool (Chainalysis, TRM Labs, or equivalent)
- Integrate FATF Travel Rule messaging platform for VASP-to-VASP transfers
- Establish SAR/CTR filing infrastructure and test with FinCEN's BSA E-Filing system
- Conduct vulnerability assessment and penetration test of platform infrastructure
- Obtain cyber liability and professional indemnity insurance

ONGOING COMPLIANCE

- Conduct annual independent AML/KYC program review
- File SARs within required timeframes for all qualifying suspicious activities
- File CTRs for all qualifying cash transaction equivalents
- Update sanctions screening databases in real-time or with maximum 24-hour lag
- Conduct quarterly transaction monitoring review and model validation
- Maintain all transaction records for minimum 5-year retention period
- Complete annual FinCEN MSB renewal and state MTL renewals
- Report material changes to business model, ownership, or key personnel to regulators
- Conduct annual AML training for all staff with customer or transaction access
- Review and update AML/KYC policies at least annually or following material regulatory changes

Important Final Notices

RISK REMINDER: This whitepaper discusses Card-to-Crypto (C2C) financial services involving significant financial risks. All cryptocurrency transactions are irreversible once confirmed on the blockchain. Processing fees of 10–20% apply to most C2C transactions. Cryptocurrency values are volatile and may change materially between transaction initiation and completion. Customers bear sole responsibility for accurate wallet address provision. All C2C transactions are final and cannot be reversed once processed. Service providers must comply with applicable AML/KYC regulations; large transactions may require additional verification. Service availability varies by jurisdiction. Always consult licensed legal and financial advisors before entering the C2C market as an operator, investor, or consumer.

This document was compiled using publicly available market research, regulatory filings, academic research, and industry publications as of February 2026. Market data is subject to revision. Regulatory frameworks are rapidly evolving; all operators must conduct independent legal analysis of current requirements in their specific jurisdictions.