

## PRIVACY POLICY

### GENERAL PROVISIONS

BIT TRADE MARKETS OÜ, a company duly incorporated in Estonia (Registration number 14555301) and its affiliates (hereinafter the “Company”), are committed to protecting and respecting the Customer’s privacy.

This Privacy Policy (together with Terms of Use) governs collection, processing and use of the Customer’s Personal Information by the Company.

The Company defines “Personal Information” as information which identifies the Customer personally, e.g. his/her name, address, e-mail address, trades etc.

The purpose of this Privacy Policy is to inform the Customer of:

1. the kinds of Personal Information which the Company may collect about its Customers and how it may be used;
2. the Company’s use of information regarding IP Addresses and its use of cookies;
3. any disclosure of Personal Information to third parties;
4. the Customer’s ability to correct, update and delete his/her Personal Information;
5. the security measures the Company has in place to prevent the loss, misuse, or alteration of Personal Information under its control.

### GATHERING AND USE OF PERSONAL INFORMATION

The Company may collect the Customer’s Personal Information if he/she uses its Website, opens a Trading Account to use the Platform or performs any Transactions on the Platform. The types of Personal Information which the Company collects may include:

1. the Customer’s name;
2. the Customer’s photographic identification;
3. the Customer’s address;
4. the Customer’s phone number;
5. the Customer’s e-mail address;
6. the Customer’s banking details including account numbers;
7. the Customer’s date of birth;
8. the Customer’s trades;
9. the Customer’s residential details including utility bills.

The Company may use the Customer’s Personal Information for the following purposes:

1. to allow the Customer to open and operate a Trading Account on the Platform;
2. to enable the Customer to complete Transactions on the Platform;
3. if the Customer contacts the Company, to reply to his/her queries;
4. to analyze use of the Company Website;
5. as required for regulatory purposes;
6. to provide the Customer with information about products and promotions that may be of interest to him/her, from the Company itself and third parties, although only if the Customer has specifically agreed to receive such information;
7. for market research e.g. surveying its Customers’ needs and opinions on issues, such as the Company’s performance etc.

The Company shall process the Customer’s Personal Information only for the purposes for which it has been provided to the Company.

### IP ADDRESSES

The Company may collect information about the Customer’s computer, including where available his/her IP address, operating system and browser type, for system administration and to report aggregate information to its advertisers. These are statistical data about its Customers’ browsing

actions and patterns and do not identify any individual.

## COOKIES

The Company uses a browser feature known as a “cookie”, which assigns a unique identification to the Customer’s computer. Cookies are typically stored on the hard drive of the Customer’s computer. Information collected from cookies is used by the Company to evaluate the effectiveness of its Website, analyze trends, and administer the Platform. The information collected from cookies allows the Company to determine such things as which parts of the Company Website are most visited and difficulties its visitors may experience in accessing the Company Website. With this knowledge, the Company can improve the quality of the Customer’s experience on the Platform by recognizing and delivering more of the most desired features and information, as well as by resolving access difficulties. The Company also uses cookies and/or a technology known as web bugs or clear gifs, which are typically stored in emails to help the Company confirm the Customer’s receipt of, and response to, its emails and to provide the Customer with a more personalized experience when using the Company Website.

The Company may use third party service provider(s) to better understand its Website use. The Company’s service provider(s) will place cookies on the hard drive of the Customer’s computer and will receive information that the Company selects that will educate it on such things as how visitors navigate around the Company Website, what products are browsed, and general Transaction information. The Company’s service provider(s) analyses this information and provides the Company with aggregate reports. The information and analysis provided by the Company’s service provider(s) will be used to better understand its visitors’ interests in the Company Website and to better serve those interests. The information collected by the Company’s service provider(s) may be linked to and combined with information that the Company collects about its Customer while he/she is using the Platform. The Company’s service provider(s) is/are contractually restricted from using information they receive from the Company Website other than to assist the Company.

By using the Company Website, the Customer agrees that the Company may use cookies for the purposes set out above.

## DISCLOSURE OF PERSONAL INFORMATION

The Company uses the Personal Information for the purposes indicated at the time the Customer provides the Company with such information, and/or otherwise for the purposes set out in this Privacy Policy and/or as otherwise permitted by law. The Company may make available the Personal Information that the Customer provides to the Company, to its affiliates, agents, representatives, trusted service providers and contractors for these limited purposes.

The Company may also share Customers’ Personal Information with financial institutions, insurance companies or other companies in the case of a merger, divestiture, or other corporate re-organization.

The Company may also share Customers’ Personal Information with law enforcement or regulatory agencies, as may be required by law.

Any third party which receives or has access to Personal Information shall be required by the Company to protect such Personal Information and to use it only to carry out the services it is performing for the Customer or for the Company, unless otherwise required or permitted by law.

The Company shall ensure that any such third party is aware of the Company’s obligations under this Privacy Policy, and the Company shall enter into contracts with such third parties by which they are bound by terms no less protective of any Personal Information disclosed to them than the

obligations the Company undertakes to the Customer under this Privacy Policy, or which are imposed on the Company under applicable data protection laws.

### **CORRECTION/UPDATING/DELETION OF PERSONAL INFORMATION**

The Customer has the right to access his/her Personal Information and to require the correction, updating and blocking of inaccurate and/or incorrect data by sending an email to the Company at: [webmaster@bit.trade](mailto:webmaster@bit.trade).

The Customer may also request the deletion or destruction of both the Trading Account and Personal Information by sending an email to the Company at: [webmaster@bit.trade](mailto:webmaster@bit.trade). The Company shall action the Customer's request only where this is not inconsistent with its legal and regulatory obligations.

Upon the Customer's written request, the Company shall inform him/her of the Personal Information relating to him/her that the Company holds and the use and general disclosure of the Customer's Personal Information. The Company shall also give the Customer a copy of the Personal Information it has retained. There may be a minimal charge for accessing the Customer's Personal Information.

### **SECURITY**

The Company has implemented security measures to ensure the confidentiality of the Customer's Personal Information and to protect his/her Personal Information from loss, misuse, alteration or destruction. Only authorized personnel of our Company have access to the Customer's Personal Information, and these personnel are required to treat the information as confidential. The security measures in place will, from time to time, be reviewed in line with legal and technical developments.

### **RETENTION OF PERSONAL INFORMATION**

The Company shall hold the Customer's Personal Information only for as long as it is necessary for it to do so, having regard to the purposes described in this Privacy Policy and the Company's own legal and regulatory requirements. In accordance with its record keeping obligations the Company shall retain Trading Accounts and Personal Information for, at least a period of five years after they are closed by the Customer.

### **LINKS**

There may be links from the Company Website to other websites and resources provided by third parties. This Privacy Policy applies only to our Company Website. Accessing those third-party websites or sources requires the Customer to leave the Company Website. The Company does not control those third-party websites or any of the content contained therein and the Customer agrees that the Company is in no way responsible or liable for any of those third-party websites, including, without limitation, their content, policies, failures, promotions, products, services or actions and/or any damages, losses, failures or problems caused by, related to or arising from those websites. The Company encourages the Customer to review all policies, rules, terms and regulations, including the privacy policies, of each website that the Customer visits.

### **MARKETING**

The Customer has the right to ask the Company not to process his/her Personal Information for marketing purposes. The Customer can exercise his/her right to prevent such processing by checking certain boxes on the forms the Company uses to collect the Customer's Personal

Information. The Customer can exercise the right at any time by contacting the Company at [webmaster@bit.trade](mailto:webmaster@bit.trade).

### **CHANGES**

The Company Website policies, content, information, promotions, disclosures, disclaimers and features may be revised, modified, updated, and/or supplemented at any time and without prior notice at the sole and absolute discretion of the Company. If the Company changes this Privacy Policy, it will take steps to notify all Customers by a notice on its Website and will post the amended Privacy Policy on the Website.

### **CONTACT THE COMPANY**

If you have any questions, comments, or concerns regarding the Company's Privacy Policy and/or practices as it or they relate to the Platform, please contact us at the following e-mail address: [webmaster@bit.trade](mailto:webmaster@bit.trade).