

PRIVACY POLICY

We ask that you read this privacy policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint. By accessing and using our services, you signify acceptance to the Company's Terms and Conditions, including this Privacy Policy. If you do not agree with any aspect of this Privacy Policy, you should immediately stop using our services. This policy applies to any service offered by us regardless of the method used to access and/or receive services, including through mobile devices and/or applications made available. This policy is supplemental to and forms part of Bitfin.io general Terms & Conditions and any other terms of use published on our website, as amended from time to time.

This privacy policy is divided into the following sections:

- Who we are
- Our website
- Our collection and use of your personal information
- Our legal basis for processing your personal information
- Who we share your personal information with
- Whether information has to be provided by you, and if so why
- Transfer of your information out of the EEA
- Cookies and similar technologies
- Marketing
- Your rights
- Keeping your personal information secure
- Data Retention
- How to complain
- Changes to this website privacy policy
- How to contact us

Who we are

This website is operated by Z&A Exchange OÜ trading as Bitfin.io. Z&A Exchange OÜ is a duly incorporated Estonian private limited company with registration number 14506364 and registered address at Kaarli pst 1 // Roosikrantsi tn 2-K291, Harju Maakond, Kesklinna Linna, 10119 Tallin, Estonia, licensed and regulated by the Estonian Financial Intelligence Unit (FIU).

We collect, use and are responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including Estonia) and we are responsible as 'controller' of that personal information for the purposes of those laws. We will solely use the personal data, directly or indirectly obtained, in accordance with applicable data protection laws and regulations and your consent.

Our website



This privacy policy relates only to your use of our website, bitfin.io and use of our services.

Throughout our website we may link to other websites owned and operated by third parties to make additional products and services available to you. These other third party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these other third party websites, please consult their privacy policies as appropriate.

Our collection and use of your personal information

We collect personal information about you when you access our website, register with us, contact us, send us feedback, purchase products or services via our website, post material to our website and complete customer surveys or participate in competitions via our website.

We collect this personal information from you either directly, such as when you register with us, contact us or purchase products or services via our website or indirectly, such as your browsing activity while on our website (see 'Cookies' below).

We also collect personal information about you from other sources as follows:

- From third party due diligence, screening and risk management service providers.

The personal information we collect about you depends on the particular activities carried out through our website. Such information includes:

- Your name, address, email address and contact details
- Date of birth
- Bank account and payment details
- Details of any feedback you give us by phone, email, post or via social media
- Information about the services we provide to you
- Your account details, such as username, login details
- Financial Data, including details to and proof of source of funds, if applicable
- Tax Identification code
- Device information, including IP address and geolocation data

We use this personal information for:

- Creating and managing your account with us
- Verifying your identity
- Providing goods and services to you
- Providing support
- Processing payments
- Prevention of fraud and illegal activity

- Customising our website and its content to your particular preferences
- Marketing and Advertising
- Notifying you of any changes to our website or to our services that may affect you
- Improving our services

This website and services offered are not intended for use by children under the age of 18 and we do not knowingly collect or use personal information relating to children.

Our legal basis for processing your personal information

When we use your personal information, we are required to have a legal basis for doing so. There are various different legal bases upon which we may rely, depending on what personal information we process and why.

The legal bases we may rely on include:

- **consent:** where you have given us clear consent for us to process your personal information for a specific purpose
- **contract:** where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract
- **legal obligation:** where our use of your personal information is necessary for us to comply with the law (not including contractual obligations)
- **vital interests:** where our use of your personal information is necessary to protect you or someone else's life
- **public task:** where our use of your personal information is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law
- **legitimate interests:** where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information which overrides our legitimate interests)

Who we share your personal information with

We may share your personal information including but not limited to, your name, address and Identification Document number with our subsidiaries, affiliated companies, subcontractors, auditors or advisors, potential buyers or investors and third party service providers. For a list of all potential recipients of your personal information please send a request to cs@bitfin.io.

This data sharing enables the company to provide you with its services and comply with legal and regulatory requirements.

Some of those third party recipients may be based outside the European Economic Area — for further information including on how we safeguard your personal data when this occurs, see 'Transfer of your information out of the EEA'.

We will share personal information with law enforcement or other authorities if required by applicable law and regulations.



We will not share your personal information with any third party without having in place the necessary safeguards for protecting your personal information.

Whether information has to be provided by you, and if so why

We will inform you at the point of collecting information from you, whether you are required to provide the information to us and why.

Transfer of your information out of the EEA

We may transfer your personal information to countries which are located outside the European Economic Area (EEA) in order to enable us to provide our services and meet legal and regulatory obligations.

Such countries may not have the same data protection laws as the EEA. Any transfer of your personal information outside of the EEA will be made after taking appropriate technical, organizational and contractual security measures that are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal information.

If you would like further information please contact us (see 'How to contact us' below). We will not otherwise transfer your personal data outside of the EEA or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

Cookies and similar technologies

A cookie is a small text file which is placed onto your device (eg computer, smartphone or other electronic device) when you use our website. We use cookies and other similar tracking technologies such as web beacons, action tags, single-pixel gifs on our website. These help us recognise you and your device and store some information about your preferences or past actions.

For further information on cookies generally visit www.aboutcookies.org or www.allaboutcookies.org.

Marketing

We would like to send you information about products and services, competitions and special offers, which may be of interest to you. Where we have your consent or it is in our legitimate interests to do so, we may do this by post, email, telephone, text message (SMS) or automated call.

We would also like to share your information with selected third parties with whom you wish to share data so that they may send you information about their products and/or services, depending on what you agree with us.

We will ask whether you would like us and other businesses to send you marketing messages when you tick the relevant boxes when you complete our online registration form for the first time.

If you have previously agreed to being contacted in this way, you can unsubscribe at any time by:



—contacting us at cs@bitfin.io

—using the 'unsubscribe' link in emails

It may take up to 7 days for this to take place.

For more information on your rights in relation to marketing, see 'Your rights' below.

Your rights

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your personal information
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances

If you would like to exercise any of those rights, please:

- email, call or write to us
- let us have enough information to identify you (eg account number, user name, registration details),
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates, including any account or reference numbers, if you have them

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.



We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Data Retention

Your personal information is retained for the duration of our contractual relationship as well as for a certain period thereafter in order to enable us to comply with our legal and regulatory obligations as well as to protect our legitimate interests.

How to complain

We hope that we can resolve any query or concern you raise about our use of your information as such you should contact us first at cs@bitfin.io.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred.

Changes to this website privacy policy

We may change this privacy policy from time to time and when required by law we will notify you of such changes. If changes made are material, you will be notified by email or through a notification on our website.

Continued use of the services will constitute your acknowledgement and consent to such amendments and your agreement to be bound by the terms of the updated Privacy Policy.

You are advised to check for updates from time to time.

How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us, please send an email to cs@bitfin.io or write to Kaarli pst 1 // Roosikrantsi tn 2-K291, Harju Maakond, Kesklinna Linna, 10119 Tallin, Estonia.