

# Bitdenex Privacy Policy

Bitdenex.com is a website which provides an overview of the trading options and trading platform of Bitdenex per region. Each region applies its own local applicable law and regulations to the local traders, which shall comply with the applicable law.

**Bitdenex International** is operated by Coindenex LLC - license no. 922 LLC 2021, which is authorized and regulated by the Financial Services Authority of St. Vincent & The Grenadines.

**Bitdenex Europe** is operated by Bitdenex B.V. - license no. R179357, which is registered, authorized, and regulated as a provider of crypto services by the Dutch Central bank, De Nederlandsche Bank N.V. ("DNB"). DNB oversees Bitdenex B.V. of the Money Laundering and Terrorist Financing Prevention Act and the Sanctions Act 1977. Bitdenex B.V. is not subject to prudential supervision by DNB or supervised by the AFM. This means that there is no supervision on financial requirements of business risks and there are no specific financial consumer protection.

**Bitdenex Suriname** is operated by Bitdenex Suriname N.V., registered under the Chamber of Commerce & Industry no. 92774, incorporated under the laws of Suriname.

Our Privacy Policy ("Privacy Policy") is designed to help you understand how we collect, use and share your personal information and to assist you in exercising the privacy rights available to you. When visiting the Bitdenex website, you automatically agree to the privacy policy. This policy is in compliance with the Privacy Legislation, the General Data Protection Regulation (GDPR). We think it is very important that you are well-informed about the Privacy Legislation.

## SCOPE:

This Privacy Policy applies to personal information processed by us in our business, including on our websites, mobile applications, and other online or offline offerings (collectively, the "Services"). This Policy applies to our operating divisions, subsidiaries, affiliates, and branches.

## Index

Article 1 Management .....	2
Article 2 Visitor information .....	2
Article 3 Cookies .....	2
Article 4 Security .....	2
Article 5 Sharing of data with third parties.....	2
Article 6: Changes to customer data.....	3
Article 7 Personal Information we collect.....	3
Article 8 How we use your information .....	4
Article 9 Disclosing your information to third parties .....	6
Article 10 Your Choices .....	7
Article 11 Data Retention.....	9
Article 12 Security of your information .....	9
Article 13 Supervisory Authority .....	9

Article 14 Changes to our Privacy Policy.....	10
Article 15 Contact us.....	10

## **Article 1 Management**

Bitdenex.com is a website which provides an overview of the trading options and trading platform of Bitdenex per region.

## **Article 2 Visitor information**

1. Some information resulting from one or more visits to the website will be saved. All information that is not required for our service will be made anonymous. Identifiable information required for our services will be saved if necessary. All laws of the Personal Data Protection Act will be respected in this.
2. We will be able to use the information provided by you for an number of purpose, including the following:
  - Sending one or more mails to determine your identity and verify your account.
  - Sending one or more e-mails such as, but not limited to, an e-mail containing log-in information.
  - To highlight important news regarding Bitdenex services.
  - The deliberate/incidental sending of e-mails if this is necessary for further collaboration between the customer and Bitdenex.
  - The performance of the services requested by the customer as offered on the website of Bitdenex.

## **Article 3 Cookies**

1. We use cookies for making the functionality of certain pages of the website possible and optimizing these features.
2. Visitors can decide themselves how cookies are handled. You can configure your browser so that it allows, disallows or partially allows cookies. For the last case, it can be configured for which websites cookies are allowed. Be aware that if you do not allow cookies, certain features cannot be performed. In this case, you cannot make full use of our services you are entitled to.
3. Cookies can always be deleted from a computer in the browser options.

## **Article 4 Security**

The information provided to Bitdenex by the customer is stored in a secure environment.

1. Your personal information is encrypted, stored offline and securely stored. There are only a few employees who have access to this information.
2. The information necessary for the performance of customer service is not stored offline and is accessible to our customer service staff.

## **Article 5 Sharing of data with third parties**

The information (within the Know Your Customer) provided to us by will never be passed on to third parties, unless required by Law. However, there are exceptions to this rule:

1. When a court or legal order has been issued to provide data.
2. In case of fraud, scams or other undesirable acts, the information may be provided to the competent authorities.

#### **Article 6: Changes to customer data**

You have at all times the opportunity to change the information provided. We can ask you in such a case to pass the change in a manner prescribed by us and, in some cases, identification may be required.

1. We are legally obliged to store your personal information in the context of the customer acceptance policy.
2. We will only store and / or process the collected information if you have explicitly given permission.
3. In the event of withdrawal of your consent, we will immediately stop collecting and processing the information. In that case you will be informed of the consequences. This may mean that you cannot use certain services from Bitdenex.

#### **Article 7 Personal Information we collect**

The categories of personal information we collect depend on whether you are a customer, user, applicant or visitor, and the requirements of applicable law.

##### **1. Information You Provide to Us**

**Account Creation:** When you create a user account of after you have started using the Services, we may collect your name, email address, date of birth, tax number, username, and password or other personal information used to identify you.

**Your Communications with Us.** We collect personal information from you such as email address, phone number, or mailing address when you request information about our Services, request customer or technical support, apply for a job or otherwise communicate with us.

**Surveys.** We may contact you to participate in surveys. If you decide to participate, you may be asked to provide certain information which may include personal information.

**Social Media Content.** We may offer forums, blogs, or social media pages. Any content you provide on these channels will be considered “public” and is not subject to privacy protections.

##### **2. Information Collected Automatically or From Others**

**Automatic Data Collection.** We may collect certain information automatically when you use the Services. This information may include your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, details about your browser, operating system or device, location information, Internet service provider, pages that you visit before, during and after using the Services, information about the links you click, and other information about how you use the Services. Information we collect may be associated with accounts and other devices.

In addition, we may automatically collect data regarding your use of our Services, such as the types of content you interact with and the frequency and duration of your activities. We may combine your information with information that other people provide when they use our Services, including information about you when they tag you.

**Cookies, Pixel Tags/Web Beacons, Analytics Information, and Interest-Based Advertising technologies.** We, as well as third parties that provide content, advertising, or other functionality on the Services, may use cookies, pixel tags, local storage, and other technologies (“Technologies”) to automatically collect information through the Services. Technologies are essentially small data files placed on your computer, tablet, mobile phone, or other devices that allow us and our partners to record certain pieces of information whenever you visit or interact with our Services.

- **Cookies.** Cookies are small text files placed in visitors’ computer browsers to store their preferences. Most browsers allow you to block and delete cookies. However, if you do that, the Services may not work properly.
- **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in the Services that collects information about users’ engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement.

**Analytics and Financial Data.** We may also use Google Analytics and other service providers to collect information regarding visitor behaviour and visitor demographics on our Services. For more information about Google Analytics, please visit <http://www.google.com/policies/privacy/partners/>. You can opt out of Google’s collection and processing of data generated by your use of the Services by going to <http://tools.google.com/dlpage/gaoptout>.

**Information from Other Sources.** We may obtain information about you from other sources, including through third party services and organizations to supplement information provided by you. For example, if you access our Services through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect information about you from that third-party application that you have made public via your privacy settings. Information we collect through these services may include your name, your user identification number, your user name, location, gender, birth date, email, profile picture, and your contacts stored in that service. This supplemental information allows us to verify information that you have provided to us and to enhance our ability to provide you with information about our business, products, and Services.

## Article 8 How we use your information

We use your information for a variety of business purposes, including to:

### 1. Fulfil our contract with you and provide you with our Services, such as:

- Managing your information and accounts;
- Providing access to certain areas, functionalities, and features of our Services;
- Communicating with you about your account, activities on our Services and policy changes;
- Undertaking activities to verify or maintain the quality or safety of a service or device;
- Processing your financial information and other payment methods for products or Services purchased;
- Providing advertising, analytics and marketing services;
- Processing applications and transactions; and
- Allowing you to register for events.

Analyse and improve our Services pursuant to our legitimate interest, such as:

- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services and short-term, transient use, such as contextual customization of ads;
- Undertaking research for technological development and demonstration;
- Researching and developing products, services, marketing or security procedures to improve their performance, resilience, reliability or efficiency;
- Improving, upgrading or enhancing our Services or device [or those of our Providers];
- Developing new products and Services;
- Ensuring internal quality control;
- Verifying your identity and preventing fraud;
- Debugging to identify and repair errors that impair existing intended functionality;
- Enforcing our terms and policies; and
- Complying with our legal obligations, protecting your vital interest, or as may be required for the public good.

Provide you with additional content and Services, such as:

- Furnishing you with customized materials about offers, products, and Services that may be of interest, including new content or Services;
- Auditing relating to interactions, transactions and other compliance activities; and
- Other purposes you consent to, are notified of, or are disclosed when you provide personal information.

## 2. Automated profiling

We may use technologies considered automated decision making or profiling. We will not make automated decisions about you that would significantly affect you, unless such a decision is necessary as part of a contract we have with you, we have your consent, or we are permitted by law to use such technology. You may escalate any concerns you have by contacting us below.

- 3. Use De-identified and Aggregated Information.** We may use personal information and other data about you to create de-identified and aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access our Services, or other analyses we create.
- 4. Share Content with Friends or Colleagues.** Our Services may offer various tools and functionalities. For example, we may allow you to provide information about your friends through our referral services. Our referral services may allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to use our Services.
- 5. How We Use Automatic Collection Technologies.** We, as well as third parties that provide content, advertising, or other functionality on the Services, may use cookies, pixel tags, local storage, and other technologies to automatically collect information through the Services. Our uses of these Technologies fall into the following general categories:
  - **Operationally Necessary.** This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular site behaviour, prevent fraudulent activity and improve security or that allow you to make use of our functionality;

- **Performance Related.** We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how our visitors use the Services;
  - **Functionality Related.** We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed;
  - **Advertising or Targeting Related.** We may use first party or third-party Technologies to deliver content, including ads relevant to your interests, on our Services or on third party sites.
6. **Cross-Device Tracking.** Your browsing activity may be tracked across different websites and different devices or apps. For example, we may attempt to match your browsing activity on your mobile device with your browsing activity on your laptop. To do this our technology partners may share data, such as your browsing patterns, geo-location and device identifiers, and will match the information of the browser and devices that appear to be used by the same person.
7. **Notice Regarding Third Party Websites, Social Media Platforms and Software Development Kits.** The Services may contain links to other websites, and other websites may reference or link to our website or other Services. These other websites are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen or approve and are not responsible for the privacy practices or content of such other websites or applications. Visiting these other websites or applications is at your own risk.

Our Services may include publicly accessible blogs, forums, social media pages, and private messaging features. By using such Services, you assume the risk that the personal information provided by you may be viewed and used by third parties for any number of purposes. In addition, social media buttons such as Facebook, Linked In, Google, etc. (that might include widgets such as the “share this” button or other interactive mini-programs) may be on our site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. These social media features are either hosted by a third party or hosted directly on our site. Your interactions with these features apart from your visit to our site are governed by the privacy policy of the company providing it.

We may use third party APIs and software development kits (“SDKs”) as part of the functionality of our Services. APIs and SDKs may allow third parties including analytics and advertising partners to collect your personal information for various purposes including to provide analytics services and content that is more relevant to you. For more information about our use of APIs and SDKs, please contact us as set forth below.

## Article 9 Disclosing your information to third parties

We may share your personal information with the following categories of third parties:

**Service Providers.** We may share any personal information we collect about you with our third-party service providers. The categories of service providers (processors) to whom we entrust personal information include: IT and related services; banks and trust companies; information

and services; payment processors; customer service providers; and vendors to support the provision of the Services.

**Business Partners.** We may provide personal information to business partners with whom we jointly offer products or services. In such cases, our business partner's name will appear along with ours.

**Affiliates.** We may share personal information with our affiliated companies.

**Advertising Partners.** Through our Services, we may allow third party advertising partners to set Technologies and other tracking tools to collect information regarding your activities and your device (e.g., your IP address, mobile identifiers, page(s) visited, location, time of day). We may also combine and share such information and other information (such as demographic information and past purchase history) with third party advertising partners. These advertising partners may use this information (and similar information collected from other websites) for purposes of delivering targeted advertisements to you when you visit third party websites within their networks. This practice is commonly referred to as "interest-based advertising" or "online behavioural advertising. We may allow access to other data collected by the Services to share information that may be useful, relevant, valuable or otherwise of interest to you. If you prefer not to share your personal information with third party advertising partners, you may follow the instructions below.

**Disclosures to Protect Us or Others.** We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

**Disclosure in the Event of Merger, Sale, or Other Asset Transfers.** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

You acknowledge that all information processed by us may be transferred, processed, and stored anywhere in the world, including but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We have taken appropriate safeguards to require that your personal information will remain protected and require our third-party service providers and partners to have appropriate safeguards as well. Further details can be provided upon request.

## **Article 10 Your Choices**

### **General**

You have certain choices about your personal information. Where you have consented to the processing of your personal information, you may withdraw that consent at any time and prevent further processing by contacting us as described below. Even if you opt out, we may still collect and use non- personal information regarding your activities on our Services and for other legal purposes as described above.

## Email and Telephone Communications

If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (e.g., communications regarding the Services or updates to our Terms or this Privacy Policy).

We process requests to be placed on do-not-mail, do-not-phone and do-not-contact lists as required by applicable law.

## Mobile Devices

We may send you push notifications through our mobile application. You may at any time opt-out from receiving these types of communications by changing the settings on your mobile device. We may also collect location-based information if you use our mobile applications. You may opt-out of this collection by changing the settings on your mobile device.

## “Do Not Track.”

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

## Cookies and Interest-Based Advertising

You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs.

Please note you must separately opt out in each browser and on each device. Advertisements on third party websites that contain the AdChoices link may have been directed to you based on information collected by advertising partners over time and across websites. These advertisements provide a mechanism to opt out of the advertising partners’ use of this information for interest-based advertising purposes.

## Your Privacy Rights

In accordance with applicable law, you may have the right to:

- **Access to/Portability of Personal Data.** about you consistent with legal requirements. In addition, you may have the right in some cases to receive or have your electronic Personal Data transferred to another party.
- **Request correction.** of your personal information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal information or we may refer you to the controller of your personal information who is able to make the correction.
- **Request deletion.** of your personal information, subject to certain exceptions prescribed by law.
- **Request restriction of or object to** processing of your personal information, including the right to opt in or opt out of the sale of your Personal Data to third parties, if applicable, where such requests are permitted by law.

If you would like to exercise any of these rights, please log into your account or contact us as set forth below. We will process such requests in accordance with applicable laws. To protect your privacy, we will take steps to verify your identity before fulfilling your request.



## **Article 11 Data Retention**

We store the personal information we receive as described in this Privacy Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defences, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

We will not keep your personal data longer than the mandatory statutory period or, if such a mandatory statutory period does not apply, no longer than is strictly necessary to achieve the purposes for which your personal data were collected or processed.

We retain your personal data to process and to execute the User Agreement with you as long as such agreement is applicable. We processes to comply with all legal obligation, as long as such legal obligation applies to us. We retain personal data for purposes to protect any legitimate interest (as described in this policy) as long as necessary to achieve such purposes. If we ask your (explicit) consent for any processing of your personal data, we retain your personal data until you withdraw your (explicit) consent (to the extent we have no legal obligation to keep retaining such data) or until your (explicit) consent would be expired while you have not given your (explicit) consent again.

In addition to the legal obligations already mentioned in this policy, we have the following legal obligations to (keep) retaining your personal data:

1. Personal data to the extent relevant for tax purposes (pursuant to Article 52 of the Dutch General Tax Act): 7 years after the latest relevant calendar year;
2. Personal data to the extent relevant to comply with Article 33(sub 3) of the Dutch Money Laundering and Terrorist Financing (Prevention) Act (Wwft): 5 years after the business relationship has been ended;
3. Personal data to the extent relevant to comply with Article 34 of the Dutch Money Laundering and Terrorist Financing (Prevention) Act (Wwft): 5 years after we have submitted a notification to the FIU Nederland.

## **Article 12 Security of your information**

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unintentional disclosure.

By using the Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on the Services, by mail or by sending an e-mail to you.

## **Article 13 Supervisory Authority**

If you are located in the European Economic Area or the UK, you have the right to lodge a complaint with a supervisory authority if you believe our processing of your personal information violates applicable law.

#### **Article 14 Changes to our Privacy Policy**

We may revise this Privacy Policy from time to time in our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use the Services after the new Privacy Policy takes effect.

#### **Article 15 Contact us**

If you have any questions about our privacy practices or this Privacy Policy, or if you wish to submit a request to exercise your rights as detailed in this Privacy Policy, please contact us at:

Email: [support@bitdenex.com](mailto:support@bitdenex.com)