

# Privacy Policy

This privacy policy sets out how Open Digital Services Limited ("btscryptos.com", "we", "us" and "our") uses and protects any information that you give btscryptos.com when you visit our website and use our Services located at <https://btscryptos.com/>

btscryptos.com is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it. By engaging with our website located at <https://btscryptos.com/> and our Services you acknowledge you have read and understood this Privacy Policy. Data protection laws require companies to describe their role and responsibility when handling personal information.

Open Digital Services, a company incorporated in Estonia and handles Digital Currency transactions originating from the EEA. btscryptos.com is the **data controller** for digital currency transactions. We provide instructions to process such transactions on website and Services located at [btscryptos.com], and to handle various administrative and organisational matters on our behalf related to such transactions.

As data controllers, we determine the means and purposes of processing data in relation to digital currency transactions. If you have any questions about your btscryptos.com Account, your personal information or this Privacy Policy, please direct your questions to [support@btscryptos.com](mailto:support@btscryptos.com)

## ACCEPTANCE OF THIS PRIVACY POLICY

By accessing and using our Services, you signify acceptance to the terms of this Privacy Policy. Where we require your consent to process your personal information, we will ask for your consent to the collection, use, and disclosure of your personal information as described further below. btscryptos.com may provide additional "just-in-time" disclosures or additional information about the data collection, use and sharing practices of specific Services. These notices may supplement or clarify btscryptos.com's privacy practices or may provide you with additional choices about how btscryptos.com processes your data. If you disagree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue access or use of our Services.

## THE INFORMATION WE COLLECT ABOUT YOU

We value your trust. In order to honour that trust, btscryptos.com adheres to ethical standards in gathering, using, and safeguarding any information you provide.

We may collect the following information when you use our Services:

- **Personal Identification Information:** Full name, date of birth, age, nationality, gender, signature, utility bills, photographs, phone number, home address, and/or email.

- **Formal Identification Information:** Passport number, driver's license details, national identity card details, photograph identification cards, and/or visa information.
- **Transaction Information:** Information about the transactions you make on our Services, such as the name of the recipient, your name, the amount, and/or timestamp.
- **Employment Information:** Office location, job title, and/or description of role.
- **Online Identifiers:** Geo location/tracking details, browser fingerprint, OS, browser name and version, and/or personal IP addresses.

**Usage Data:** Survey responses, information provided to our support team, public social networking posts, authentication data, security questions, user ID, click-stream data and other data collected via cookies and similar technologies. Please refer to our cookies policy for more information at <https://btscryptos.com/cookie-policy>

## HOW WE USE YOUR PERSONAL INFORMATION

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- **To maintain legal and regulatory compliance** Some of our core Services are subject to laws and regulations requiring us to collect and use your personal identification information, formal identification information, financial information, transaction information, employment information, online identifiers, and/or usage data in certain ways. When you seek permissions to raise Digital Currency buy and sell limits associated with your btscryptos.com Account, we may require you to provide additional information which we may use in collaboration with service providers acting on our behalf to verify your identity or address, and/or to manage risk as required under applicable law.
- **To enforce our terms in our user agreement and other agreements**

btscryptos.com handles very sensitive information, such as your identification and financial data, so it is very important for us and our customers that we are actively monitoring, investigating, preventing and mitigating any potentially prohibited or illegal activities, enforcing our agreements with third parties, and/or violations of our posted user agreement or agreement for other Services. In addition, we may need to collect fees based on your use of our Services. We may use any of your personal information collected on our Services for these purposes. The consequences of not processing your personal information for such purposes is the termination of your account as we cannot perform our Services in accordance with our terms.

- **To provide our Services**

We process your personal information in order to provide the Services to you. For example, when you want to buy Digital Currency, we require certain information such as your identification, contact information, and payment information. We cannot provide you with Services without such information.

- **To provide Service communications**

We send administrative or account-related information to you to keep you updated about our Services, inform you of relevant security issues or updates, or provide other transaction-related information. Without such communications, you may not be aware of important developments relating to your account that may affect how you can use our Services.

- **To provide customer service**

We process your personal information when you contact us to resolve any questions, disputes, collect fees, or to troubleshoot problems. We may process your information in response to another customer's request, as relevant. Without processing your personal information for such purposes, we cannot respond to your requests and ensure your uninterrupted use of the Services.

**EEA Residents:** For all of the above categories, excluding the first bullet point, pursuant to EEA Data Protection Law, we process this personal information based on our contract with you.

#### **To ensure network and information security**

- We process your personal information in order to enhance security, monitor and verify identity or service access, combat spam or other malware or security risks and to comply with applicable security laws and regulations. The threat landscape on the internet is constantly evolving, which makes it more important than ever that we have accurate and up-to-date information about your use of our Services. Without processing your personal information, we may not be able to ensure the security of our Services.
- Merchant will not sell, purchase, provide, exchange or in any other manner disclose Account or Transaction data, or personal information of or about a Cardholder to anyone, except, it's Acquirer, Visa/Mastercard Corporations or in response to valid government demands.

**EEA Residents:** Pursuant to EEA Data Protection Law, we process this personal information to satisfy our legal obligations.

- **For research and development purposes**

We process your personal information to customise, measure, and improve our Services and the content and layout of our website and applications, and to develop new services. Without such processing, we cannot ensure your continued enjoyment of our Services.

**EEA Residents:** Pursuant to EEA Data Protection Law, we process this personal information to satisfy our legitimate interests as described above.

- **To enhance your website experience**

We process your personal information to provide a personalised experience, and implement the preferences you request. For example, you may choose to provide us with access to certain personal information stored by third parties Without such

processing, we may not be able to ensure your continued enjoyment of part or all of our Services.

**EEA Residents:** Pursuant to EEA Data Protection Law, we process this personal information to satisfy our legitimate interests as described above.

- **To facilitate corporate acquisitions, mergers, or transactions**

We may process any information regarding your account and use of our Services as is necessary in the context of corporate acquisitions, mergers, or other corporate transactions. You have the option of closing your account if you do not wish to have your personal information processed for such purposes.

**EEA Residents :** Pursuant to EEA Data Protection Law, we process this personal information to satisfy our legitimate interests as described above.

- **To engage in marketing activities**

Based on your communication preferences, we may send you marketing communications to inform you about our events or our partner events; to deliver targeted marketing; and to provide you with promotional offers based on your communication preferences. We use information about your usage of our Services and your contact information to provide marketing communications. You can opt-out of our marketing communications at any time

**EEA Residents :** Pursuant to EEA Data Protection Law, we process this personal information to satisfy on your consent.

Please note that we do not knowingly request to collect personal information from any person under the age of 18. If a user submitting personal information is suspected of being younger than 18 years of age, btcryptos.com will require the user to close his or her account and will not allow the user to continue buying or selling digital currencies. We will also take steps to delete the information as soon as possible. Please notify us if you know of any individuals under the age of 18 using our Services so we can take action to prevent access to our Services.

## **HOW WE PROTECT INFORMATION PROVIDED**

The security of your personal information is important to us. When you enter sensitive information (such as a credit card number), your information is sent over an authenticated and encrypted connection using Transport Layer Security (TLS).

We store your personal information only on servers with limited access that are located in controlled facilities, and use a variety of technologies and procedures intended to protect your personal information from loss, misuse, unauthorized access, disclosure, alteration and destruction. Nonetheless, no communication via the Internet can ever be 100% secure, and no security measures can ever be assured to be effective. Accordingly, you are advised to use caution and discretion when determining what personal information to disclose to us.

If you have any questions about security on our Site, contact us as set below.

## **ADDITIONAL INFORMATION**

We may request additional details or to answer further questions in order to verify your

information. We may also obtain additional information about you from third parties, including third party partners. This information includes information about your behaviour, bank accounts or payment methods issued by third party financial institutions that are linked to your btscryptos.com Account. We also collect information about which tabs you visited on our site, your browser information, your location and your frequency of use of our site.

## **USE OF COOKIES**

Cookies are small files, typically of letters and numbers, downloaded onto your computer or mobile device when you visit certain websites. When you return to these websites or visit other websites that use the same cookies, the websites recognize these cookies and your browsing device. A cookie cannot read data off your hard drive or read cookie files created by other websites.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Please refer to the btscryptos.com Cookie Policy for more information about our use of cookies.

## **LINKS TO OTHER WEBSITES**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## **CONTROLLING YOUR PERSONAL INFORMATION**

When btscryptos.com is acting as a data processor, we will only process personal information in accordance with the instructions given by the data controller. When btscryptos.com is acting as a data controller, we will act in accordance with your permission to offer you our services and as otherwise instructed by you. We will also give you the ability to opt out before we disclose your personal information to a third party or use your personal information for purposes that are fundamentally different than the purpose for which it was originally created.

If you would like to discontinue receiving communications from us, you may update your email preferences by using the "Unsubscribe" link found in emails we send to you or on the Communications Preferences Dashboard located in your account profile on our Site or by contacting us at [support@btscryptos.com](mailto:support@btscryptos.com). Please note that we may not include the opt-out information in emails that are transactional in nature and are not marketing communications (i.e., emails concerning your transactions and security, the website's Terms of Use, etc.). You will not have the ability to opt-out of receiving transactional emails via the Communications Preferences Dashboard. If you have questions or concerns regarding a transactional email, please contact us.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

## **RIGHTS IN RELATION TO THE USE OF YOUR PERSONAL INFORMATION**

- **Rights of access, correction and deletion**

You have a right of access to the personal information that we hold about you under European data protection legislation, and to some related information. You can also require any inaccurate personal information to be corrected or deleted.

- **Right to object**

You can object to our use of your personal information for direct marketing purposes at any time and you may have the right to object to our processing of some or all of your personal information (and require them to be deleted) in some other circumstances. If you wish to exercise any of these rights, please contact us as set out below.

### **EEA USERS & DATA**

#### **Legal bases for processing personal information**

Our legal bases for processing under EEA Data Protection Law are described above in the sections entitled "How Your Information Is Used" and "Information From Third Party Partners." We may process your personal information if you consent to the processing, to satisfy our legal obligations, if it is necessary to carry out our obligations arising from any contracts we entered with you, or to take steps at your request prior to entering into a contract with you, or for our legitimate interests to protect our property, rights or safety of btscryptos.com, our customers or others.

#### **Direct Marketing**

If you are a current customer residing in the EEA , we will only contact you by electronic means (email, SMS or phone call) with information about our Services that are similar to those which were the subject of a previous sale or negotiations of a sale to you.

If you are a new customer and located in the EEA , we will contact you if you are located in the EU by electronic means for marketing purposes only if you have consented to such communication. If you do not want us to use your personal information in this way, or to pass your personal information on to third parties for marketing purposes, please contact us at [support@btscryptos.com](mailto:support@btscryptos.com). You may raise such objection with regard to initial or further processing for purposes of direct marketing, at any time and free of charge. Direct marketing includes any communications to you that are only based on advertising or promoting products and services.

#### **Individual Rights**

EEA Residents have the following rights, which can be exercised by contacting us at [support@btscryptos.com](mailto:support@btscryptos.com) so that we may consider your request under applicable law.

- **Right to withdraw consent.** You have the right to withdraw your consent to the processing of your personal information collected on the basis of your consent at any time. Your withdrawal will not affect the lawfulness of btscryptos.com processing based on consent before your withdrawal.
- **Right of access to and rectification of your personal information.** You have a right to request that we provide you a copy of your personal information held by us. This information will be provided without undue delay subject to some fee associated with gathering of the information (as permitted by law), unless such provision adversely affects the rights and freedoms of others. You may also request us to rectify or update any of your personal information held by btscryptos.com that is inaccurate. Your right to access and rectification shall only be limited where the burden or expense of providing access would be disproportionate to the risks to your privacy in the case in question, or where the rights of persons other than you would be violated.
- **Right to erasure.** You have the right to request erasure of your personal information that: (a) is no longer necessary in relation to the purposes for which it was collected or otherwise processed; (b) was collected in relation to processing that you previously consented, but later withdraw such consent; or (c) was collected in relation to processing activities to which you object, and there are no overriding legitimate grounds for our processing. If we have made your personal information public and are obliged to erase the personal information, we will, taking account of available technology and the cost of implementation, take reasonable steps, including technical measures, to inform other parties that are processing your personal information that you have requested the erasure of any links to, or copy or replication of your personal information. The above is subject to limitations by relevant data protection laws.
- **Right to data portability.** If we process your personal information based on a contract with you or based on your consent, or the processing is carried out by automated means, you may request to receive your personal information in a structured, commonly used and machine-readable format, and to have us transfer your personal information directly to another "controller", where technically feasible, unless exercise of this right adversely affects the rights and freedoms of others. A "controller" is a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of your personal information.
- **Right to restriction of or processing.** You have the right to restrict or object to us processing your personal information where one of the following applies:
  - You contest the accuracy of your personal information that we processed. In such instances, we will restrict processing during the period necessary for us to verify the accuracy of your personal information.
  - The processing is unlawful and you oppose the erasure of your personal information and request the restriction of its use instead.
  - We no longer need your personal information for the purposes of the processing, but it is required by you to establish, exercise or defence of legal claims.
  - You have objected to processing, pending the verification whether the legitimate grounds of btscryptos.com's processing override your rights.

Restricted personal information shall only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of



another natural or legal person or for reasons of important public interest. We will inform you if the restriction is lifted.

- **Notification of erasure, rectification and restriction.** We will communicate any rectification or erasure of your personal information or restriction of processing to each recipient to whom your personal information have been disclosed, unless this proves impossible or involves disproportionate effort. We will inform you about those recipients if you request this information.
- **Right to object to processing.** Where the processing of your personal information is based on consent, contract or legitimate interests you may restrict or object, at any time, to the processing of your personal information as permitted by applicable law. We can continue to process your personal information if it is necessary for the defence of legal claims, or for any other exceptions permitted by applicable law.
- **Automated individual decision-making, including profiling.** You have the right not to be subject to a decision based solely on automated processing of your personal information, including profiling, which produces legal or similarly significant effects on you, save for the exceptions applicable under relevant data protection laws.
- **Right to lodge a complaint.** If you believe that we have infringed your rights, we encourage you to contact us first at [support@btscryptos.com](mailto:support@btscryptos.com) so that we can try to resolve the issue or dispute informally. You can also complain about our processing of your personal information to the relevant data protection authority.
- **Storage of your personal information.** btscryptos.com will try to limit the storage of your personal information to the extent that storage is necessary to serve the purpose(s) for which the personal information was processed, to resolve disputes, enforce our agreements, and as required or permitted by law.

Your rights to personal information are not absolute and access may be denied in some circumstances such as the following:

- Denial is authorized by law;
- When granting access have a negative impact on other's privacy;
- When the request is insignificant or vexatious
- To protect our rights and properties

## INFORMATION FROM THIRD PARTY SOURCES

From time to time, we may obtain information about you from third party sources as required or permitted by applicable law, such as public databases, credit bureaus, ID verification partners, marketing partners, and social media platforms. Information obtained about you from public databases and ID verification partners for purposes of verifying your identity.

ID verification partners use a combination of government records and publicly available information about you (such as your name, address, job role, public employment profile, status on any sanctions lists maintained by public authorities, and other relevant data.) to verify your identity. We obtain such information to comply with our legal obligations, such as anti-money laundering laws. Please refer to our AML Policy for further details. Pursuant to EEA Data Protection Law, our lawful basis for processing such data is compliance with legal obligations. In some cases, we may process additional data about you to ensure our Services are not used fraudulently or for other



illicit activities. In such instances, processing is necessary for us to continue to perform our contract with you and others.

### **CHANGES TO THIS PRIVACY POLICY**

We reserve the right to modify this Privacy Policy at any time, and when required by law, we will notify you of changes to this Privacy Policy. If we make any material changes we will notify you by email (sent to the email address specified in your account) or by means of a notice on our Services prior to the change becoming effective. As reference, we will retain prior versions of our Privacy Policy.

Your continued use of our Site after any such changes constitutes your acceptance of the new Privacy Policy constitutes your acceptance of the new Privacy Policy. If you do not agree to abide by these or any future version of the Privacy Policy, you do not have permission to use or access (or continue to use or access) our Site and Services.

### **CONTACT US**

You may request details of personal information which we hold about you under the Data Protection Act 1998. If you would like a copy of the information held on you, please reach out to us from our contact info given below.

If you believe that any information we are holding on you is incorrect or incomplete, you can contact us immediately to the contact information given below. We will promptly correct any information found to be incorrect. Questions or comments regarding this Privacy Policy can be submitted to [btscryptos.com](mailto:btscryptos.com) by email or phone as follows:

Email: [\*\*support@btscryptos.com\*\*](mailto:support@btscryptos.com)

Physical Address: Harju Maakond, Tallinn, Kesklinna, Joe tn 9, 10151