

When you visit our site www.litebit.eu and/or use our mobile applications, **2525 Ventures B.V. ("LiteBit")** processes personal data of its visitors. LiteBit values your privacy and ensures due care with regard to the processing and protecting of personal data.

During the processing of your personal data, we adhere to the requirements of relevant privacy legislation, including (from 25 May 2018 onwards) the General Data Protection Regulation (GDPR). In this Privacy Statement (the "**Statement**"), we explain what types of personal data we collect, why we collect such data, how we deal with personal data and what rights you have. Due to the innovative nature of digital currency and the crypto environment in general, the services that we provide through our website and mobile applications may change over time. Therefore, it is advisable to revisit this Statement from time to time.

This Privacy Statement was last amended on April 13th 2021.

1. USE OF PERSONAL DATA

1.1 By using our website and its functionalities, the following (categories of) personal data may be processed for the purposes as mentioned in this Statement:

- Name;
- Address;
- Country of residence;
- Telephone number;
- E-mail address;
- Login details;
- Passport/ID-card;
- Date of Birth;
- Place of Birth;
- Nationality;
- Cryptocurrency (wallet) address;
- IP-address;
- IBAN-number;
- Verification documents;
- Client ID;
- Transaction information;
- Proof of funds;
- Other information that you voluntarily share with us.

1.2 These categories of personal data include information that you provide to us, or information that our website and other systems collect about you.

2. PURPOSES OF THE PROCESSING OF PERSONAL DATA

2.1 By using our website and the website's functionalities the abovementioned categories of personal data may be processed. We may use your personal data if we have your consent or another legally permitted reason applies. These include to fulfil a contract with you, when we have a legal duty to comply with, or when it is in our legitimate business interest to use your personal data. We can only rely on our legitimate business interest, if it is fair and reasonable to do so. We may process your personal data for the following purposes:

- **Creating an account**

Via our website you can create an account on our online platform. This account allows you to buy, sell and store cryptocurrencies (in your Wallet). To create an account, we will ask you to fill in your name, e-mail address, birth date, password and nationality. In the event of suspicion of fraud or misuse of our website we may hand over personal data to the entitled authorities. When creating an account, we process your personal data for the performance of your agreement with LiteBit.

- **Buying and/or selling Cryptocurrencies**

Via our website you can buy and sell cryptocurrencies. To do so you need to log in to your online account using your e-mail address and password. After the verification of your payment method you are asked to fill in the address of your (cryptocurrency) wallet. In some cases, while buying and/or selling cryptocurrencies you may be asked to proceed to the verification procedure as part of our security measures. When buying and/or selling cryptocurrencies we process your personal data for the performance of your agreement with LiteBit.

- **Verification procedure**

At LiteBit we have a verification procedure in place as part of our security measures for buying, selling and/or storing cryptocurrencies. In order to complete this verification procedure we need your name, email address, date of birth, country of residence and telephone number. You also need to provide us with a copy of your passport or ID-card and address details. If deemed necessary you need to provide us with more verification documents. When proceeding through the verification procedure we process your personal data in order to comply with a legal duty.

- **Customer and Transaction Monitoring**

Customers and transactions are monitored in order to prevent anti-money laundering and financing of terrorism. When monitoring, we process your personal data in order to comply with a legal duty.

- **Setting price alerts**

At LiteBit you can set a price alert to be notified when the price for a specific coin reaches a set threshold. We will send this notification to the e-mail address that you provided us. When setting price alerts, we process your personal data with your consent, which can be withdrawn at any time.

- **Contacting LiteBit**

If you have any questions relating to for instance an order or cryptocurrencies in general, you can either call, email or chat with us. You can also contact us via our social media channels or by filling in our contact form. To answer a question that is sent via the contact form, we will process your name and e-mail address. When contacting LiteBit we process your personal data on account of a legitimate business interest.

- **Receiving our newsletter**

We have a newsletter to inform those interested about our services. You can ask to receive the newsletters by clicking the newsletter checkbox in your online account. To receive our newsletter, we process your personal data with your consent, which

can be withdrawn at any time by opting out from receiving future marketing communications through an opt-out button included in each communication.

- **Other uses**

We may further use your information for the following purposes:

- To operate, manage, develop and promote our business and, in particular, our relationship with the organization you represent (if any) and related transactions – this includes, for example, marketing and billing/ payment purposes;
- LiteBit has a legal obligation to know who our Customers are in accordance with Know Your Customer (KYC) regulations. LiteBit has contracted specialized parties to do parts of this KYC onboarding process for LiteBit. Personal data can be shared with these parties for meeting the KYC regulations;
- To operate, administer and improve our website and premises and other aspects of the way in which we conduct our operations;
- To protect our business from fraud, money-laundering, breach of confidence, theft of proprietary materials and other financial or business crimes; and
- To comply with our legal and regulatory obligations and file and defend legal claims.

When processing your personal information for these purposes, we process your personal data on account of a legal duty and/or legitimate business interest.

2.2 We may from time to time review information about you held in our systems – including the contents of and other information related to your email and other communication with us – for compliance and business-protection purposes as described above. This may include reviews for the purposes of disclosure of information relevant to litigation and/or reviews of records relevant to internal or external regulatory or criminal investigations. To the extent permitted by applicable law these reviews will be conducted in a reasonable and proportionate way and will be approved at an appropriate level of management. They may ultimately involve disclosure of your information to governmental agencies and litigation counterparties as described below. Your emails and other communications may also occasionally be accessed by persons other than the members of staff with whom they are exchanged for ordinary business management purposes (for example, if necessary, when a staff member is out of the office or isn't an employee of LiteBit anymore).

2.3 We will only process your personal information if this is necessary for the purposes described above, and then only where we have concluded that our processing does not prejudice you or your privacy in a way that would override our legitimate interest in pursuing those purposes. In exceptional circumstances we may also be required by law to disclose or otherwise process your personal information. We will tell you, when we ask you to provide information about yourself, if providing the requested information is necessary for compliance with a legal obligation or, on the other hand, if it is purely voluntary. If it is voluntary there will be no implications if you decline to provide the information. Otherwise you should assume that we need the information for our business or compliance purposes (as described above). If you are uncertain as to LiteBit's need for information that we request from you, please

contact the LiteBit representative asking for the information, or Contact us (see below), with your query.

3. RETENTION OF PERSONAL DATA

As a rule, we store your personal data for as long as necessary for the purpose for which the data were collected, as described in this Statement. After the retention period is finished or when the data is no longer necessary for the purpose for which the data were collected, the personal data will be deleted.

LiteBit has a legal obligation to retain personal data used for identification, verification, research activities and notifications to the FIU for a period of 5 years after the business relationship has been ended (Article 33 (3) Wwft, Article 34 Wwft). Data regarding transactions will be kept by LiteBit for a period of 7 years after the latest relevant calendar year (pursuant to Article 52 of the Dutch General Tax Act).

4. (INTERNATIONAL) DATA TRANSFERS AND DISCLOSURE TO THIRD PARTIES

4.1 We may disclose your personal data where we have obtained your consent or where it is reasonably necessary for the various purposes set out above:

- To the other members of the LiteBit group of companies;
- To improve our website and premises and other aspects of the way in which we conduct our operations;
- To service providers, including hosting providers, payment providers, e-mail service providers and (web) developers who host our website or other information technology systems or otherwise hold or process your information on our behalf, under strict conditions of confidentiality and security;
- To a person who takes over our business and assets, or relevant parts of them; or
- In exceptional circumstances:
 - To competent regulatory, prosecuting and other governmental agencies, or litigation counterparties, in any country or territory; or
 - Where we are required by law to disclose.

4.2 These disclosures may involve transferring your personal information overseas. If you are dealing with us within the European Economic Area (or the UK, after it has left the European Economic Area), you should be aware that this may include transfers to countries outside the European Economic Area / UK, which do not have similarly strict data privacy laws. In those cases, where we transfer personal data to other members of the LiteBit group or our service providers, we will ensure that our arrangements with them are governed by data transfer agreements or mechanisms, designed to ensure that your personal information is protected on the same level (including, where appropriate, under an agreement on terms approved for this purpose by the European Commission). Please contact us (see below) if you would like to know whether any such agreements are in place or, if so, to see a copy.

5. SECURITY

We take appropriate technical and organizational security measures to protect your personal data. We take the following measures in particular:

- Access to personal data requires the use of a user name and password;
- We take physical measures to protect access to the systems in which the personal data is stored;
- We make use of secure connections (Transport Link Security or TLS) to encrypt all information between you and our website when entering your personal data;
- We keep logs of all requests regarding access to personal data;
- Regular penetration testing and security review by specialized parties;
- Use of multifactor authentication where applicable; and
- Training of employees on security best practices.

6. THIRD-PARTY WEBSITES

This Statement is not applicable to third-party websites connected to this website through links. We cannot guarantee that these third parties will handle your personal data in a secure and careful manner. We recommend that you read these websites' privacy statements before making use of these websites.

7. CHANGES TO THIS PRIVACY STATEMENT

We reserve the right to modify this Statement. We recommend that you review this Statement regularly, so that you remain informed of any possible changes.

8. YOUR RIGHTS

8.1 You have certain rights involving the processing of your data:

- You have the right to request access to the personal data that we have registered about you;
- When the data is incorrect or no longer relevant, you can request any inaccurate personal information to be corrected, supplemented or deleted (right to rectification and supplementation).
- In some circumstances you have the right to limit the processing of your personal data by us;
- In some cases you have the right to be forgotten, which means we have to erase the personal data we hold from you;
- You can object to our use of your personal data at any time and you may have the right to object to our processing of some or all of your personal data (right to object) and require them to be deleted in some other circumstances;
- In some circumstances, you have the right to obtain a copy of your data in a usual, machine-readable format in order to be able to transfer it to another organization (right to data portability);
- You have a right regarding automated decision-making and profiling which means you have the right to a human review when decisions are being made.

8.2 To exercise your rights involving the processing of your data, you can contact LiteBit's customer support (<https://www.litebit.eu/nl-nl/contact>). You will receive a 'Personal data request'- form ("Form") on the email address that we registered from you. Your request will be processed once you've correctly filled out the Form and sent the Form back to us. We may ask you to provide an identification document and/or other personal information in order to determine your identity and to ensure that no one other than you is trying to execute your privacy rights. We adhere to the legal deadlines regarding the execution of the request. This means that generally a request will be processed within one month. This period can be

extended to two months if it is considered a complex request. You will be notified when the period is extended.

In certain cases, if legally permitted, we may deny your request. We will inform you about the reason for denying your request.

9. NATIONAL SUPERVISORY AUTHORITY

Of course, we will also, gladly, help you if you have any complaints about the processing of your personal data. Based on privacy legislation, you have the right to lodge a complaint with the relevant national data protection authority, responsible for the protection of personal data (this is the 'Autoriteit Persoonsgegevens' for the Netherlands) against our processing of your personal data.

10. COOKIES

When you visit our site www.litebit.eu and/or use our mobile applications, we may obtain information about you by using a "cookie", which is a small file transferred by a website and stored on your device (such as your computer, mobile phone, tablet, etc.). Cookies could contain personal information about you that is transferred to your device. They help us to improve our website and to deliver a better and more personalized service. Some of the cookies we use are essential for the site to operate. You can read more about what cookies we use, for what purpose and how to accept or reject them in LiteBit's Cookie Statement.

11. CONTACT INFORMATION

In case you, after reading our Privacy and/or Cookie Statement, still have questions and/or suggestions you can contact us via the below stated contact data or by our contact page.

LiteBit.eu

Weena 740,
3014 DA Rotterdam
The Netherlands

Litebit.eu is part of 2525 Ventures B.V. located in Rotterdam.