



## **PRIVACY POLICY**

July 23, 2021

Version 0.1

### **LEGAL NOTICE**

Bitstack is an online service developed by BITSTACK SAS, a French simplify joint-stock company with a capital of 10,000 euros, registered in the Trade and Companies Register of Aix-en-Provence under number 899 125 090, domiciled at 100, impasse des Houillères - Le Pontet, 13590, Meyreuil.

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## 1. Foreword

- 1.1. BITSTACK (hereinafter referred to as the “**Bitstack**” or the “**Company**”) is a savings platform in virtual assets (bitcoin), allowing its users (the “**Users**” or “**You**”) to buy/sell bitcoin, round up their everyday purchases and save the spare change in bitcoin, and save a fixed amount on a recurring basis (the “**Service**”).
- 1.2. For further information, please consult our Company’s [FAQ](#) and website related to the Service at the following address: [bitstack.fr](http://bitstack.fr) (the “**Website**”).
- 1.3. To inform its Users transparently, the Company has implemented this privacy policy (the “**Privacy Policy**”). It explains in detail why and how your data is processed when You register on the Website.
- 1.4. The Privacy Policy is accessible at any time on the Service [Website](#) and prevails over any previous version.

## 2. Subject

- 2.1. The protection of your data and privacy are our Company’s priority, and it implements all appropriate measures to ensure their respect.
- 2.2. This Privacy Policy intends to inform You, as a User, through any terminal, application or device (hereinafter the “**Equipment**”), about the way our Company processes, as a controller, information enabling to identify You either directly or indirectly (hereinafter “**Personal Data**”) in the context of your registration on the Service Website.

## 3. Update

- 3.1. The Privacy Policy may evolve. The up-to-date version is the one available on the Website when using the Service.
- 3.2. By registering on the Service Website, You are consenting to the version in force and available on the Website at that time.

## 4. Data collected and Purposes

- 4.1. When You register on our Website, our Company processes Personal Data for particular purposes, each duly legitimate on a valid legal basis.
- 4.2. Please find a summary table of the information collected, the purposes and the legal basis for each of them according to the General Data Protection Regulation (“**GDPR**”):

INFORMATION	PURPOSE(S)	LEGAL BASIS
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<p align="center"><b>Browsing information</b></p>	<p>From Cookies, as above described in Article 10, which qualify as Personal Data.</p>	<p>Our Company is willing to understand how Users use its Website for the Service.</p> <p>It needs to process various browsing information for the performance of logical operations related to the Website and Service use.</p>	<p>The legitimate interest of our Company, which consists of :</p> <p>(i) understanding the way its Website and Service is browsed by Users and visitors (including You); and</p> <p>(ii) improving the Website where needed.</p>
<p align="center"><b>Discussions or comments</b></p>	<p>Identification data (i.e. the information you provide, including your name and email address) ;</p> <p>Content of the message(s) You sent to our Company as a question/request.</p>	<p>Managing and following up any questions, requests or feedback You may submit.</p> <p>Please note that this processing is carried out if You submit a question, request or feedback directly to our Company's.</p> <p>Otherwise, Your Personal Data is not processed for this purpose.</p>	<p>The legitimate interest of our Company consists of duly managing its relationships with You.</p>

4.3. You are under no obligation to provide the requested Personal Data. Nevertheless, our Company draws to Your attention that, in such a case, access to the Website may be altered, if not impossible.

4.4. In any event, and disregarding the processing purpose at stake, please note that our Company will comply with a strict data minimization principle and thus only collect and process Personal Data necessary for the above purposes.

## 5. Data recipients

5.1. Our Company shares your Personal Data with third-party service providers and suppliers, which assist the Company in fulfilling the purposes specified in this Privacy Policy.

5.2. The service providers and suppliers may have access to Personal Data for the sole and exclusive purpose of carrying out the missions assigned to them. Our Company ensures that the service providers and suppliers have sufficient legal and technical guarantees for the performance of the task and comply with the applicable laws and regulations.

- 5.3. Furthermore, as the case may be, our Company shares your Personal Data with competent courts and any other governmental and public authorities requesting access to your Personal Data, within the extent legally permitted.
- 5.4. In any event, our Company communicates your Personal Data to the above recipients on a strictly need-to-know basis and only as necessary for fulfilling duly identified processing purposes.

## 6. Storage period

- 6.1. Our Company stores Personal Data for a limited duration, not exceeding the fulfilment of purposes described in Article 4 (*Data collected and Purposes*) of this Privacy Policy.
- 6.2. **Personal identification.** The maximum storage period of your Personal Data collecting to comply with the AML/KYC Procedure is five (5) years from the termination of the business relationship.
- 6.3. **Browsing information.** The maximum storage period for Cookies is thirteen (13) months from the time they are placed on your browser or Equipment. At the end of this period, new consent is required.
- 6.4. **Other information.** Concerning your other Personal Data, as described in the summary table above, our Company will not retain your Personal Data for more than one (1) year following your last action on the Website or the last contact from you.
- 6.5. If our Company considers it does not need to retain your Data in its active database, it will archive it and will ensure that access to it is restricted to a limited number of persons who have an actual need to access your Personal Data.

## 7. Data transfer

- 7.1. Personal Data may be processed outside the European Union territory. In that situation, Company shall take all necessary precautions and alternatively or cumulatively ensure that (i) an adequacy decision has been taken by the European Commission regarding the country of destination; (ii) contractual clauses adopted by the European Commission or the supervisory authority have been signed with the recipient; (iii) the recipient adheres to an approved code of conduct or certification mechanism.

## 8. User's rights

- 8.1. As a data subject, You benefit from various rights regarding the processing of your Personal Data. These are as follows:
- request from Company access to and rectification or erasure of your Personal Data;
  - request from Company restriction of the processing concerning You;
  - object to the processing of your Personal Data;

- portability of your Personal Data;
- give guidelines regarding the use of your Personal Data after your death; and
- complaint with the French Data Protection Authority (CNIL), the competent supervisory authority.

8.2. To exercise your rights or for any question on Personal Data protection, You shall make a request accompanied by proof of identity to the Company according to Article 11 (*Contact*).

8.3. Company shall strive to reply without undue delay and at the latest within one (1) month after receiving the request. Company reserves the right to extend this period to three (3) months in the case of a complex request.

8.4. Company protects your Personal Data and complies with the applicable data protection legal framework. To this end, the Company may require your assistance. Thus, You commit to informing Company if the Personal Data You shared with us becomes obsolete or inaccurate.

8.5. In addition, in the event You provide Company with information enabling to identify directly or indirectly any other natural persons (e.g. You sent a request to Company with the contact email address available on the Website and share Personal Data concerning another natural person in your email), You represent and warrant that, before sharing this information with Company, such other natural persons have been provided with this Privacy Policy and, to the extent applicable, have consented to the processing of their data.

## 9. Security

9.1. Company undertakes to take all appropriate technical and organizational measures to ensure the security and confidentiality of the Personal Data processed.

## 10. Cookies

10.1. You are informed that information may be transmitted to Your browser or Equipment while using the Website ("**Cookies**"). When You browse the Website for the first time, a Cookie banner may be displayed requesting You to accept, refuse or configure Cookies.

10.2. Our Company uses cookies for :

- functionality (language, location, etc.);
- advertising.

10.3. You may accept, refuse, and delete specific or all Cookies. You may also contact us if You have any questions about our Company's cookies, as described in Article 11 (*Contact*).

10.4. You are informed that certain cookies' refusal may affect the delivery of the Service provided and the navigation on the Website.

- 10.5. Company informs You that Cookies may be configured in your browser's help menu at the following URLs: [Google](#); [Mozilla Firefox](#); [Safari](#); [Edge](#), and [Opera](#).

## 11. Contact

- 11.1. If You have any questions regarding this Privacy Policy, including but not limited to concerning your rights as described in Article 8 (*User's rights*) above, please contact the Company by sending a mail to [hello@bitstack.fr](mailto:hello@bitstack.fr).
- 11.2. You may also consult our Website (including our [FAQ](#)) for further information.