

# PRIVACY POLICY OF BITCASH LLC

01.12.2021

Grodno

This privacy policy of Bitcash LLC (hereinafter referred to as the Privacy Policy) is developed in accordance with the Law of the Republic of Belarus dated 07.05.2021 No. 99-3 "On Protection of Personal Data", other legislative acts, as well as in accordance with the requirements of external services (specialized platforms), which place the "BITCASH" Mobile Application for download by users, and determines the main approaches to the processing of personal data and other information of individuals.

The objectives of the development of this Privacy Policy are to ensure the protection of the rights and freedoms of a person and a citizen when processing his personal data, including the protection of the rights to privacy, personal and family secrets, compliance with the requirements of legislation and world practices in terms of approaching information provided by individuals.

## 1. DEFINITIONS

1.1. In this Privacy Policy, the following terms and definitions are used in the following meanings:

**The Law on Personal Data** is the Law of the Republic of Belarus dated 07.05.2021 No. 99-3 "On Protection of Personal Data"..

**Mobile application** – a computer program (mobile application) "BITCASH", which organizes interaction between the Cryptocurrency Exchange Operator, the Bank, Users and allows:

store digital signs (tokens) of Users, fix (reflect) the relevant information in the Mobile Application;

connect the User to the System of the Cryptocurrency Exchange Operator in order for the User to carry out transactions for the purchase, sale of digital signs (tokens) for Belarusian rubles and (or) foreign currency;

connect the User to the System of the Cryptocurrency Exchange Operator in order to make transactions for the exchange of digital signs (tokens) for other digital signs (tokens);

record (reflect) the information received from the Cryptocurrency Exchange Operator as a result of completed transactions;

redirect the User to the bank transfer service, other services of the Bank for issuing virtual bank payment cards (crypto cards);

record (reflect) information about the User's bank payment cards entered by the User;

provide other services determined by the available functionality of the Mobile Application.

**The operator of the cryptocurrency exchange** is White Bird LLC, a legal entity resident of the Republic of Belarus, which is a resident of the High-Tech Park.

**Personal data** - any information relating to an identified individual or an individual who can be identified. An individual within the framework of this Privacy

Policy means both the User and any other natural person whose personal data can be used by Bitcash LLC.

**User** – an individual who uses the Mobile Application in ways and for purposes in accordance with its functional purpose.

**Site visitor** - an individual or a representative of a legal entity that performs any actions on the site of Bitcash LLC (request, familiarization, compilation of information, etc.).

**Loyalty Program** – a system of rewards and incentives for Users by accruing points (Satoshi) in the Mobile Application, providing promo codes for subsequent use when making transactions with digital signs (tokens) in the System of the Cryptocurrency Exchange Operator;

**The Site (the Company's website)** is the official website of Bitcash LLC, located in the global computer network Internet at [www.bitcash.by](http://www.bitcash.by).

**The System of the Cryptocurrency Exchange Operator** is software, the rights to which belong to the Cryptocurrency Exchange Operator.

**Personal data entity** – an individual in respect of whom personal data is processed.

**Bank** – CJSC VTB Bank (Belarus).

Other terms are used in the meanings defined by the Law on Personal Data, other acts of the legislation of the Republic of Belarus.

## 2. GENERAL PROVISIONS.

2.1. Bitcash Limited Liability Company (hereinafter referred to as Bitcash LLC or the Company) is the owner of the rights to the Mobile Application, and also carries out entrepreneurial and other activities in the manner prescribed by the legislation of the Republic of Belarus.

Bitcash LLC does not process the personal data of Users to provide services using the Mobile Application. If the processing of personal data of Users is necessary to make transactions with digital signs (tokens), issue virtual bank payment cards (crypto cards), settlements and other banking operations, such processing of personal data is carried out by the Cryptocurrency Exchange Operator or the Bank in accordance with the legislation and the rules established by them. At the same time, Bitcash LLC has the right to provide these persons with the opportunity (right) to use the functionality of the Mobile Application to process users' personal data using automation tools. Processing of personal data of Users in these cases will be carried out on the basis of agreements concluded between users and the Operator of cryptocurrency exchange or the Bank, or if there are other grounds provided for in the legislation.

Nevertheless, in the event that the algorithm of the Mobile Application is changed or supplemented (which will be reflected in the relevant documents available for review by Users) and Bitcash LLC will need to process the Users' personal data, the changes made will be reflected in this Privacy Policy. Processing of personal data in such cases will be carried out in accordance with the requirements of the Law on Personal Data, other acts of legislation of the Republic of Belarus and this Privacy Policy.

If necessary, Bitcash LLC in the course of ongoing economic activity will process personal data of individuals, for example:

employees of Bitcash LLC, dismissed employees, candidates for filling vacant positions;

participants and affiliates of Bitcash LLC;

counterparties and clients of Bitcash LLC who are individuals;

representatives of counterparties and clients of Bitcash LLC who are individuals;

visitors to the site, individuals who provided personal data by subscribing to advertising mailings, when sending feedback, appeals, by filling out questionnaires during the ongoing advertising games, promotions and other events.

At the same time, in all cases when Bitcash LLC will process personal data, this processing will be carried out in accordance with the requirements of the law and if there are proper grounds for such processing.

2.2. Bitcash LLC may redirect personal data subjects (Users, site visitors) to third-party services to implement certain functions of the Mobile Application, in particular to the information systems of the Bank or the Cryptocurrency Exchange Operator, as well as other services available at the following addresses: <https://zerion.io> , <https://changenow.io>, <https://sumsub.ru>.

These services and subjects are not subject to this Privacy Policy, are governed by their own local legal acts (for example, posted at the addresses of <https://zerion.io/terms.pdf>, <https://zerion.io/privacy.pdf>, <https://whitebird.io/assets/files/clients-personal-datahandling.pdf>, [https://whitebird.io/assets/files/public-offer\\_09\\_2021.pdf](https://whitebird.io/assets/files/public-offer_09_2021.pdf), <https://sumsub.ru/privacy-policy>), Bitcash LLC is not responsible for their functioning and actions in relation to Users, site visitors.

2.3. Bitcash LLC recognizes the importance of ensuring the security of information of Users, site users and uses reasonable security measures, including physical, administrative and technical security measures to protect the information stored in the Mobile Application.

Among the technologies used there is a Secure Sockets Layer (SSL) encryption technology, which helps to protect information in the Mobile Application during transmission over the Internet. The Company also uses technologies such as: ECDSA, EDDSA, AES, homomorphic encryption.

The mobile application is not intended for persons under 18 years of age. The Privacy Policy is aimed at knowingly not collecting or storing information from persons under the age of 18. However, Bitcash LLC cannot guarantee compliance with this rule, since the use of the Mobile Application is carried out without checking the identity documents of the Users.

2.4. Please carefully read our Privacy Policy to find out how personal data is processed, for what purposes they are used and how the subject of personal data, another individual can exercise his rights provided by law.

### **3. TSELI AND LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA. PROCESSING OF TECHNICAL INFORMATION**

3.1. The processing of personal data, if carried out, is limited to the achievement of specific, predetermined and legitimate purposes. The processing of personal data incompatible with the purposes of collecting personal data is not allowed.

3.2. Only personal data that meet the purposes of their processing are subject to processing.

3.3. Processing of personal data by Bitcash LLC is carried out for the following purposes:

- consideration of candidates for employment, as well as in the course of the Company's labor activity;

- carrying out activities in accordance with the Company's charter;

- preparation of commercial offers, conclusion and execution of contracts;

- implementation of existing systems of one-time and accumulative discounts and bonuses for services, promotions and loyalty programs (if it is provided for by the Loyalty Program);"

- implementation of information and advertising mailing;

- collecting information through feedback forms, collecting statistical information, administering the Company's website, providing access to services, information and / or materials contained on the Company's website;

- identification of individuals registered on the Company's website (in the case of the functioning of the individual registration service on the Company's website);

- identification of registered Users of the Mobile Application (in case of functioning of the User registration service in the Mobile Application);

- organization of the access regime;

- conclusion, execution, modification and termination of certain contracts;

- consideration of appeals of citizens and legal entities.

3.4. Processing of personal data of potential, current and former employees of Bitcash LLC is carried out in order to attract and select candidates for employment in the Company, conclude and execute civil, employment contracts (contracts), conduct personnel records management, assist employees in obtaining education, advanced training, promotion, ensuring the personal safety of employees, controlling the number and the quality of the work performed, compliance with the working time regime, ensuring the safety of property, organizing the access regime, organizing individual (personified) registration in the system of compulsory pension insurance, filling out and transmitting the required reporting forms, accounting, intra-corporate communication and organization of work processes and for other purposes in accordance with the requirements of the current legislation and local legal acts Bitcash LLC.

3.5. The legal grounds for the processing of personal data are the current legislation of the Republic of Belarus, contracts concluded between the Company and the subjects of personal data (including within the framework of labor relations), the consent of personal data subjects to the processing of their personal data.

3.6. The content and scope of the processed personal data must comply with the stated purposes of processing provided for in clause 3.3 of the Privacy Policy. The processed personal data must not be excessive in relation to the stated purposes of their processing.

3.7. Bitcash LLC has the right to process the following personal data depending on the categories of personal data subjects and the purposes of processing:

surname, name, patronymic;

gender;

citizenship;

date and place of birth;

passport or other identity document data;

address of registration at the place of residence;

address of actual residence;

place of work, position held (specialty, profession);

data that are automatically transmitted by the device of the subject of personal data, with the help of which the Company's website is used, information stored in cookies that were sent to devices, login and password, other similar information;

other contact details in cases where they allow the identification of a natural person;

information on education, qualifications, vocational training and advanced training, work, marital status and family ties, other personal data provided and reported by candidates in resumes and cover letters, employees in accordance with the requirements of labor legislation.

3.8. Bitcash LLC processes technical information when using the Mobile Application by the User or visiting the Company's website by a visitor to the website on the Internet. Such information does not allow to identify an individual using the Mobile Application or visiting the Company's website, and therefore does not apply to personal data. However, in order to avoid ambiguity in the attribution of information to technical, the following are the types of relevant information processed by Bitcash LLC:

City (\$city) – the city of the User (site visitor), the analysis of which can be distinguished from the IP, information about the latitude and longitude of the technical device;

Region (\$region) - the region (state or province) of the User (site visitor), analyzed from the IP property or the latitude and longitude of the technical device;

Country (mp\_country\_code) – the country of the User (site visitor), analyzed in the IP or Latitude and Longitude properties.

GeoSource (\$geo\_source) is a method for setting property values for the Country (mp\_country\_code), Region (\$region), and City (\$city) parameters. If the value is zero, the location properties were determined using the IP property (\$ip);

Time zone (\$timezone) – the time zone of the User or site visitor, determined by the IP address;

Initial Referrer (\$initial\_referrer) – URL of the first record of the site visitor;

Browser version (\$browser\_version), Browser (\$browser) – version number of the site visitor's browser;

Operating system (\$os) – the operating system of the User or site host;

LastSeen (\$last\_seen) – the last time when the User or site visitor performed actions in the Mobile Application or on the Website;

DeviceName (\$device) – the name of the User's device, if it is located on the mobile Internet;

iOSDeviceModel (\$ios\_device\_model) – identifier of the User's device model, in the format "iPad 3,4", etc.

iOS version (\$ios\_version) – the current version of iOS on the User's device;

Device identifier (\$device\_id) – a unique string identifying the User before the authentication or identification process (if the functionality of the Mobile Application or the website provides for identification);;

Account ID (\$device\_id) – account number in the Mobile Application;

Application version (\$app\_version) – the version of the Mobile Application used by the User;

Backup biometric copy (\$backup biometric) – information on whether the procedure for backing up access to the User's account in the Mobile Application was performed, including using biometric data;

Crypto wallet balance (\$BTC, ETH, etc.) – the balance on the User's crypto wallets.

This information is processed by Bitcash LLC to ensure the operability and convenience of using the Mobile Application and the website, to support the services and business functions available in the Mobile Application, as well as to prevent fraud (misuse of the Mobile Application by third parties). The purpose of Bitcash LLC is to limit the information processed to the information necessary to support the business and improve the quality of the services provided.

3.9. Bitcash LLC does not process special categories of personal data relating to race, nationality, political views, religious or philosophical beliefs, state of health, etc., except in cases provided for by the legislation of the Republic of Belarus.

#### **4. RIGHTS OF PERSONAL DATA SUBJECTS**

4.1. Subjects of personal data have the rights provided for in the legislation, in particular in Chapter 3 of the Law on Personal Data, as well as those specified in this Privacy Policy.

4.2. The subject of personal data has the right to:

1) at any time without giving reasons to withdraw their consent to the processing of personal data by submitting an application to the Company in writing or in the form of an electronic document;

2) receive information regarding the processing of his personal data, except for cases provided for by law. The list of information and the procedure for obtaining it is established by the Law on Personal Data;

3) require the Company to make changes to its personal data in the event that personal data are incomplete, outdated, inaccurate by submitting an application to the Company in writing or in the form of an electronic document, with the relevant documents attached and (or) their copies certified in accordance with the established procedure, confirming the need to make changes to personal data;

4) receive information from the Company on the provision of their personal data to third parties once a calendar year free of charge by submitting an application in writing or in the form of an electronic document, unless otherwise provided by the Law on Personal Data and other legislative acts;

5) demand from the Company the free termination of the processing of their personal data, including their deletion, in the absence of grounds for processing personal data provided for by the Law on Personal Data and other legislative acts, by submitting an application in writing or in the form of an electronic document, as well as take measures provided for by law to protect their rights;

6) appeal against the actions (inaction) and decisions of the Company that violate its rights when processing personal data to the authorized body for the protection of the rights of personal data subjects (the National Center for the Protection of Personal Data) in the manner prescribed by the legislation on appeals of citizens and legal entities, and adopted by the authorized body for the protection of the rights of subjects personal data decision – to the court;

7) exercise other rights provided for by law or this Privacy Policy.

## **5. THE PROCEDURE AND CONDITIONS FOR THE PROCESSING OF PERSONAL DATA, OTHER INFORMATION**

5.1. Processing of personal data is carried out by Bitcash LLC in accordance with the requirements of the legislation of the Republic of Belarus.

5.2. The processing of personal data is carried out with the consent of the subjects of personal data to the processing of their personal data, as well as without such consent in cases provided for by the legislation of the Republic of Belarus.

5.3. The consent of the subject of personal data can be obtained both by personally signing the consent, and by putting a corresponding electronic mark on the site Company or in the Mobile App (if such functionality is available on the website or in the Mobile application).

5.4. Bitcash LLC has the right to carry out both automated and non-automated processing of personal data.

5.5. Employees of the Company whose job duties include the processing of personal data are allowed to process personal data.

5.6. The processing of personal data is carried out by:  
receiving personal data in oral and written form directly from the subjects of personal data;

obtaining personal data from publicly available sources;

entering personal data on the Company's website (if such functionality is available);

use of other methods of processing personal data.

5.7. Disclosure to third parties and distribution of personal data without the consent of the subject of personal data is not allowed, unless otherwise provided by law. Consent to the processing of personal data permitted by the subject of personal data for distribution is issued separately from other consents of the subject of personal data to the processing of his personal data.

5.8. The transfer of personal data to law enforcement and judicial bodies, state bodies and organizations, other organizations and institutions is carried out in accordance with the requirements of the legislation of the Republic of Belarus.

5.9. Bitcash LLC takes the necessary legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them,

destruction, modification, blocking, distribution and other unauthorized actions. Relations in the field of processing and protection of personal data are regulated by local legal acts in force in the Company.

5.10. Bitcash LLC processes personal data no longer than required by the purposes of personal data processing. A certain period of personal data processing may be established by the legislation of the Republic of Belarus, the contract, the consent of the subject of personal data.

5.11. The processing of personal data is terminated upon the occurrence of one or more of the following events:

receipt from the subject of personal data of the withdrawal of consent to the processing of his personal data in accordance with the established procedure;

achieving the purposes of their processing;

expiration of the consent of the subject of personal data;

detection of unlawful processing of personal data;

termination of the Company's activities.

5.12. In case of detection of inaccurate personal data at the request of the subject of personal data or at his request or at the request of the authorized body for the protection of the rights of personal data subjects, the Company blocks personal data relating to this subject of personal data from the moment of receipt of the specified application or request for the verification period. The Company, on the basis of information provided by the subject of personal data or the authorized body for the protection of the rights of personal data subjects, or other necessary documents, clarifies personal data within 15 days from the date of submission of such information and removes the blocking of personal data.

5.13. In case of detection of illegal processing of personal data upon receipt of an application from the subject of personal data or a request from the authorized body for the protection of the rights of personal data subjects, the Company blocks illegally processed personal data relating to this subject of personal data from the moment of such an appeal or receipt of an application in writing or in the form of an electronic document.

5.14. Upon achievement of the purposes of personal data processing, as well as in the event of the expiration of the period of consent to the processing of personal data or the withdrawal by the subject of personal data of consent to their processing (when processing was carried out on the basis of such consent), personal data are subject to deletion, unless otherwise provided by another agreement between Bitcash LLC and the subject of personal data or legislation.

The information provided by the User in the process of using the Mobile Application and not related to personal data is stored for 10 years from the date of the last use of the Mobile Application. In particular, the storage of an e-mail address, a static preset key on the Company's servers, to gain the User's access to his account.

## **6. CROSS-BORDER TRANSFER OF PERSONAL DATA**

6.1. In the event of a need for cross-border transfer of personal data, Bitcash LLC is obliged to make sure before the start of its implementation that a foreign state,

to the territory of which it is planned to transfer personal data, ensures reliable protection of the rights of personal data subjects.

Cross-border transfer of personal data in the territory of foreign states that do not meet the above requirements can be carried out only if there is the consent of the subject of personal data to the cross-border transfer of his personal data and / or the execution of the contract to which the subject of personal data is a party, if this does not contradict the requirements of the law.

6.2. Bitcash LLC will not transfer the information provided by the Users and available in the Mobile Application to third parties, except for the cases provided for by the concluded agreements with the Users, as well as when:

1) maintenance and technical support of the Mobile Deposit will be carried out by another organization that undertakes to comply with this Privacy Policy (while the transfer of personal data of users will not be carried out);

2) when it is necessary to comply with the requirements of the law.

## **7. FINAL PROVISIONS**

7.1. This Privacy Policy comes into force from the date of its publication by reference in the Mobile Application and / or on the Company's website, may be changed unilaterally by Bitcash LLC with the mandatory publication of changes (new edition of the Privacy Policy) in the same ways as the initial publication was ensured.

7.2. Users, other individuals may receive clarifications from Bitcash LLC regarding the provisions of this Privacy Policy by sending a request in writing or in the form of an electronic document.

Address of Bitcash LLC: Republic of Belarus, 230026, Grodno, ul. Pobedy, 30. The address of the Company's official website is [www.bitcash.by](http://www.bitcash.by).

Consideration of appeals in writing or in the form of an electronic document will be carried out in accordance with the requirements of the legislation of the Republic of Belarus regarding citizens' appeals.

Also, Users can contact Bitcash LLC by e-mail [support@bitcash.by](mailto:support@bitcash.by). In this case, the procedure for considering appeals is established directly by the Company.