



Poortland 66 • 1046BD Amsterdam • The Netherlands  
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# Privacy Policy

Txbit values your privacy and ensures due care with regards to processing and protecting of personal data. We collect information about our customers and users when they use the Txbit platform, the services, and our websites. This policy explains what types of personal data we collect, why we collect such data, how we deal with personal data and what rights you have.

This privacy policy does not apply to third-party services, products, or websites even if they link to Txbit, and You should consider the privacy practices of those third-parties carefully.

## 1. Personal data we collect

By using Txbit platform, services and website, the following personal data, and the categories of such data may be processed for the purposes as mentioned in this Statement:

- Name;
- Address;
- Country of residence;
- Telephone number;
- E-mail address;
- Cryptocurrency (wallet) address;
- IP-address;
- National Identification number;
- Login details;
- Passport/ID-card/Drivers License;
- Nationality;
- Client ID;
- Transaction information;
- Other information that you voluntarily share with us.

## 2. Legal grounds for processing your personal data

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.

### **Contract**

Txbit processes your personal data for concluding and performing a contractual obligation, such as when opening an account with us.

### **Legal Obligation**



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As a registered Dutch company operating in the cryptocurrency field, there are many rules for recording personal data which we are legally obliged to provide to others. Some of the legal obligations that Txbit must comply with are:

- Txbit has to take considerable measures to combat fraud, tax evasion, money laundering and terrorist financing. For this reason we collect your proof of identity such as ID documents to make sure we know who you are.
- Txbit is required to keep your personal data to comply with our obligations to different Dutch acts, such as Dutch Civil Code, Dutch Anti-Money Laundering and Anti-Terrorist Financing Act.
- Other Dutch organisations may ask provide personal data, these include Dutch Tax and Customs Administration, Netherlands Authority for the Financial Markets (AFM), the Dutch Central Bank (DNB), Estonian Financial Intelligence Unit (FIU) and the European Central Bank (ECB).

### 3. How we use the data

We process and use your data to help Txbit company and our associated services to be as effective, reliable and efficient, while meeting all the regulatory obligations of the Netherlands. We use your personal data for the following, non-extensive, purposes:

- To conduct manual or systematic monitoring for fraud and other harmful activity;
- To respond to inquiries, send service notices and provide customer support;
- To verify an identity for compliance purposes;
- For audits, regulatory purposes, and compliance with industry standards;
- To develop new products;
- To process a payment, communicate regarding a payment, and provide related customer service;
- To send marketing communications;
- To improve or modify our Services; and
- To conduct aggregate analysis and develop business intelligence that enables us to operate, protect, make informed decisions, and report on the performance of our business.

Txbit may from time to time review the personal data about you held in our systems for compliance and business-protection purposes. 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 approved by senior management.

### 4. Data Retention

Txbit will retain your Personal Data for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. Please note that we have a variety of obligations to retain the Data that you provide to us, including to ensure that transactions can be appropriately processed or settled, to help identify fraud and to comply with Know Your Customer, anti-money laundering and other laws and rules that apply to us and to our financial service providers. After the retention period is finished or



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the data is no longer necessary for the purpose for which the data were collected, the personal data will be deleted.

## 5. Data disclosure to third parties

In certain situations, Txbit may disclose your personal data to other people or entities involved in the provision of our services. We may disclose your information to the following:

- To Identity Verification Services. We share Data with third-party identity verification services in order to prevent fraud. This allows Txbit to confirm your identity by comparing the information you provide us to public records and other third-party databases.
- To competent regulatory, prosecuting and other governmental agencies, or litigation counterparties, in any country or territory; or
- To a person/company who takes over our business and assets, or relevant parts of them;

## 6. Security

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

- We make sure that our business processes take into account the sensitive nature of your personal data.
- We take necessary physical and digital measures to protect access to the systems in which the personal data is stored.
- We keep logs of all requests regarding access to personal data.
- Regular penetration testing and review of our security practices.
- Use of multifactor authentication where applicable.
- Training of employees on security best practices.

## 7. Your Rights

You have certain rights involving the processing of your data:

- 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). In some situations, however, we are permitted to use your data even if you object, such instances may include fraud prevention, investigation of unusual transactions and money laundering.
- You have the right to demand an overview of all personal data relating to you that we use.
- If your personal data is incorrect, you can make a request for us to change your personal data.
- You can ask us to erase your personal data at any time. We are not always able to do this, however, and do not always have to comply with your request, for example if we are required by law to keep your personal data for a longer period of time.



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- 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.
- 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. Changes to Privacy Policy

Occasionally Txbit may revise this Privacy Policy to reflect changes in law or our personal data collection and use practices. If material changes are made to this Privacy Policy, the changes will be announced by posting on the Txbit website.