

**PRIVACY NOTICE**

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**1. ABOUT US**

- 1.1. This Privacy Notice provides you with the basic information on how Lightbit, UAB, a company registered in the Republic of Lithuania, legal entity code 306162827, registered address at Perkūnkiemio g. 3, Vilnius, Lithuania, a registered virtual currency exchange and deposit wallet operator (**we, us**) processes personal data of its clients (**you** or the **Clients**).
- 1.2. We are your personal data controller and shall independently set the purposes and means of the processing of personal data. We ensure data protection by implementing provisions of the Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter – the **GDPR**) and other personal data protection legislation.
- 1.3. Please read this Privacy Notice carefully. Should you have any questions regarding the processing of your personal data, please do not hesitate to contact us.

**2. WHAT IS A LEGAL BASIS FOR DATA PROCEESING?**

- 2.1. We process your personal data only if and to the extent that at least one of the following bases applies:
  - 2.1.1. you have given us a *consent* to the processing of your personal data for one or more specific purposes;
  - 2.1.2. processing is necessary for the performance of a *contract* concluded between you and us or to take steps at your request prior to entering into a contract;
  - 2.1.3. processing is necessary for compliance with a *legal obligation* to which we, as data controller, are subject to;
  - 2.1.4. processing is necessary to protect your *vital interests* or the ones of another natural person;

- 2.1.5. processing is necessary for the performance of a task carried out in the *public interest or in the exercise of official authority* vested in us, as data controller;
- 2.1.6. processing is necessary for the purposes of the *legitimate interests* pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms, which require protection of personal data.

- 2.2. We use contract, legal obligation, consent, and legitimate interest as main bases for data processing.
- 2.3. You shall always have a right to revoke your consent to process your personal data. If we have no other legal basis for the processing of personal data, we will cease processing of personal data immediately after the cancellation/revocation of the consent provided by you.

**3. WHAT YOUR DATA IS PROCESSED?**

- 3.1. We process the following data of yours:

<b>Processing purposes</b>	<b>Processed data</b>	<b>Legal ground for processing</b>
<i>Provision of services</i>	<ul style="list-style-type: none"> <li>• personal identity data (name, surname, date of birth, etc.);</li> <li>• contact details (address, telephone number, e-mail address, etc.);</li> <li>• financial data (payment account number, account balance, data about executed transactions, etc.);</li> <li>• identification documents (ID document, passport, etc.);</li> <li>• other data provided by client (and/or his representatives);</li> <li>• data relating to the Company’s services.</li> </ul>	<ul style="list-style-type: none"> <li>• performance of a <i>contract</i> to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract</li> </ul>
<i>Access to the individual client’s account</i>	<ul style="list-style-type: none"> <li>• unique login credentials (username, password, etc.);</li> <li>• information about client’s activity on the individual account</li> </ul>	<ul style="list-style-type: none"> <li>• performance of a <i>contract</i> to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract</li> </ul>
<i>Prevention of money laundering and terrorism financing</i>	<ul style="list-style-type: none"> <li>• personal identity data (name, surname, date of birth, data from an identity document and a copy of the document, etc.);</li> <li>• contact details (address, telephone number, e-mail address, etc.);</li> <li>• visual data (photo, direct video transmission (direct video broadcast) recording, etc.);</li> <li>• data about activities (current activity, current public function, etc.);</li> </ul>	<ul style="list-style-type: none"> <li>• compliance with a <i>legal obligation</i> to which the Company, as data controller, is subject to</li> </ul>

Processing purposes	Processed data	Legal ground for processing
	<ul style="list-style-type: none"> <li>financial data (payment account number, account balance, data about executed transactions, etc.);</li> <li>other data provided by client (and/or its employees/representatives/beneficiaries) and data required by the Law.</li> </ul>	
Fraud prevention and credit risks	<ul style="list-style-type: none"> <li>transaction history</li> <li>information from other sources (e.g., credit history information from credit bureaus)</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests of data subjects and the Company</li> </ul>
<i>Administration of clients' requests</i>	<ul style="list-style-type: none"> <li>contact details (telephone number, e-mail address, etc.);</li> <li>record of conversations with clients</li> <li>all communication logs with clients</li> </ul>	<ul style="list-style-type: none"> <li>data subject's <i>consent expressed through the active actions – submitting a request</i></li> </ul>
<i>Direct marketing</i>	<ul style="list-style-type: none"> <li>e-mail address</li> </ul>	<ul style="list-style-type: none"> <li>data subject's <i>consent expressed when subscribing to the Company's newsletters</i></li> <li>client's consent is not required to for the Company to send direct marketing messages by e-mail providing relevant information about other (related) services provided by the Company.</li> <li>Client may opt-out of these messages at any time</li> </ul>
<i>Visiting Company's website</i>	<ul style="list-style-type: none"> <li>IP address;</li> <li>access date and time;</li> <li>device operating system data;</li> <li>information about the Internet provider;</li> <li>geo-location data;</li> <li>language settings, etc. Legal ground for processing such data is legitimate interest.</li> <li>cookies</li> </ul>	<ul style="list-style-type: none"> <li><i>legitimate interests</i> pursued by the Company</li> <li>in case of cookies - data subject's <i>consent expressed through the active actions – accepting cookies</i></li> </ul>
Provision of technical support	<ul style="list-style-type: none"> <li>internet protocol (IP) address used to connect your computer to the Internet</li> <li>login, e-mail address, password and location of device or computer</li> <li>services metrics (e.g., the occurrences of technical errors, your interactions with service features and content, and your settings preferences)</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests of data subjects and the Company</li> </ul>

Processing purposes	Processed data	Legal ground for processing
	<ul style="list-style-type: none"> <li>• version and time zone settings</li> </ul>	

#### 4. HOW DO WE PROTECT YOUR DATA?

- 4.1. We take protecting of your personal data very seriously and constantly apply all necessary organisational and technical measures in order to ensure confidentiality, integrity and availability of your personal data.
- 4.2. To protect your personal data, we shall, including, but not limited to:
- 4.2.1. always document processing of personal data in data security policies and procedures;
  - 4.2.2. clearly define our internal roles and responsibilities related to the processing of personal data;
  - 4.2.3. ensure access, change resource and asset management;
  - 4.2.4. prior engaging third parties as data processors, the Company shall define, document, and reconcile all necessary formalities with such data processors;
  - 4.2.5. establish basic procedures to be followed in the event of an incident or personal data breach to ensure the necessary continuity and availability of the processing of personal data by IT systems;
  - 4.2.6. ensure that all employees understand their responsibilities and obligations regarding the processing of personal data;
  - 4.2.7. implement measure for the protection of servers, databases, workstations and for security of network and software;
  - 4.2.8. apply backups and data recovery practices.

#### 5. DO WE SHARE YOUR DATA WITH OTHERS?

- 5.1. We may share your personal data with:
- 5.1.1. other members of the group of companies to which we belong for purposes consistent with this Privacy Notice (for example, for implementation of “Reliance on Third Parties” mechanism);
  - 5.1.2. when engaging service providers, i.e., data processors, to process your personal data (e.g., companies providing data storage, server and/or communication services, companies developing and maintaining software, companies providing marketing services and analysis of activities online, online traffic and website analysis, statistics services and other service providers, persons participating in the provision of our services);
  - 5.1.3. our business counterparties when engaging in providing certain services to them;
  - 5.1.4. third parties, such as courts, persons providing legal or audit services, in compliance with legal requirements.
- 5.2. We transfer your data to third parties only after concluding required legal agreements with such persons and in cases where such third parties capable of ensuring the processing of personal data in accordance with the requirements of the GDPR. We always take measure to ensure that its data processors have adequate technical and organizational arrangements in place.

- 5.3. As a general rule, the Company shall not transfer personal data outside the European Economic Area (EEA). However, in some cases, the performance of the Company's activities may require transfer of personal data to a data recipient outside the EEA (e.g., if our service provider is located outside of the EEA) to a certain extent. In this case, we shall aim to ensure that the security measures required for such data transfer are implemented.

## 6. HOW LONG YOUR DATA IS STORED?

- 6.1. We keep data in a form, which permits identification of data subjects for no longer than it is necessary for the purposes for which personal data is processed (*storage limitation principle*).
- 6.2. As a general rule we store data for the period of 8 (eight) years, unless specific retention limits are defined in legal acts regulating anti-money laundering, archiving, employment, tax, data protection, etc.
- 6.3. We ensure that data for which retention period is completed, is no longer processed. At the end of the defined retention period, we either destroy personal data or anonymize it.

## 7. WHAT ARE YOUR RIGHTS?

- 7.1. You have the following right established by the GDPR:

- |                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7.1.1. <i>Right to be informed</i>                       | You have a right to be informed about your data processing, including purposes and legal grounds of processing.                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 7.1.2. <i>Right of access</i>                            | You have a right to get information as to whether personal data concerning you is being processed, and, if that is the case, access to your personal data and defined information about such data processing.                                                                                                                                                                                                                                                                                                                                                                 |
| 7.1.3. <i>Right of rectification</i>                     | You have the right to request to rectify inaccurate personal data concerning you or complete the incomplete personal data.                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 7.1.4. <i>Right to erasure ("right to be forgotten")</i> | You have the right to request the erasure of your personal data in the following cases: <ul style="list-style-type: none"><li>○ the personal data are no longer necessary;</li><li>○ you withdraw consent on which the processing is based and where there is no other legal ground for the processing;</li><li>○ you object to the processing and there are no overriding legitimate grounds for the processing;</li><li>○ your personal data has been unlawfully processed;</li><li>○ your personal data has to be erased for compliance with a legal obligation.</li></ul> |

- 7.1.5. *Right to restriction of processing* You have a right to request the restriction of processing of your personal data in the following cases:
- you contest the accuracy of the personal data – for a period enabling us to verify the accuracy of the personal data;
  - the processing is unlawful, and you oppose the erasure of the personal data and request the restriction of their use instead;
  - we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise, or defence of legal claims;
  - you have objected to processing pending the verification whether the legitimate grounds of the controller override those of yours, as data subject.
- 7.1.6. *Right to data portability* You have a right to receive the personal data you, which you have provided to us, in a structured, commonly used, and machine-readable format and have the right to transmit those data to another controller in the following cases:
- the processing is based on consent or on a contract pursuant; and
  - the processing is conducted by automated means.
- You have a right to have the personal data transmitted directly from one controller to another, where technically feasible.
- 7.1.7. *Right to object* You have a right to object at any time to processing of personal data concerning you which is based on legitimate interest or public interest, including profiling.
- Where personal data are processed for direct marketing purposes, you have a right to object at any time to such processing of personal data.
- 7.1.8. *Rights in relation to automated individual decision making, including profiling* You have a right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects you.
- 7.2. To exercise your rights, contact us by e-mail at [compliance@lightbit.co](mailto:compliance@lightbit.co). Having received your written request, we may ask you to confirm your identity and/or to revise the scope of the implementation of your specific right as a data subject.
- 7.3. We shall take necessary actions to timely and properly react to your requests related to data processing. We shall seek to reply to your request immediately, but in all cases no later than within 1 (one) month. In certain cases, for example, extremely large amount of data, we may prolong this term for another 2 (two) months.

- 7.4. Normally, we shall manage all requests free of charge. In cases, there requests are evidently ungrounded or disproportionate, for example, due to their repetitive nature, we may consider to (i) charge reasonable fee based on actual administrative costs; or (ii) to refuse act on the request.
- 7.5. You also have the right to make a complaint to the State Data Protection Inspectorate (L. Sapiegos str. 17, 10312, Vilnius, the Republic of Lithuania; e-mail: [ada@ada.lt](mailto:ada@ada.lt); more information on their [website](#)).

## **8. CHANGES TO PRIVACY NOTICE**

- 8.1. We have the right to adjust this Privacy Notice. In such case, we will notify you of any changes of the Privacy Notice in advance and will publish a new version of the Privacy Notice on our website.