

Bitireland Broker Limited (“Bitireland”)

Website Privacy Notice

This information notice sets out details of the personal data relating to you that we collect via the Bitireland website and how we will process it.

About Us

Bitireland Broker Limited of Riverside One, Sir John Rogerson's Quay, Dublin 2, D02 X576 is the controller of personal data that is gathered through the Bitireland website. If you have any questions about our use of your personal data, please contact us at info@bitireland.ie

Personal Data that We Process

We process the following personal data about you:

- Log-in Details – If you create an account with our website we will collect your name, email address, bitcoin address, phone number and IP address.
- AML/KYC Details – We may ask you to provide certain documentation, such as a copy of government issued ID and proof of address, in order to undertake AML/KYC checks.
- Purchases – If you make a purchase on our website we will collect details about the purchase you have made, such as the value of the purchase, the bitcoin that is purchased, the date of the purchase and when the transaction was completed. We will also collect details in relation to the bank transfer that is used.
- Customer Services – If you send any comments, queries or complaints to our customer services department, we will process your personal data in order to respond to your comment, query or complaint.
- Website Usage – We collect details about your general usage of our website through setting cookies and using similar technologies. [Bitireland Borker Ltd Cookies Policy - www.bitireland.ie/Docs/BitirelandBrokerCookiesPolicy.pdf](http://www.bitireland.ie/Docs/BitirelandBrokerCookiesPolicy.pdf)

Sources of Personal Data

We collect personal data from you directly, and from the following sources:

- www.knowyourcustomer.com

Purposes of Processing and Legal Basis

We set out below the purposes of the processing of each category of personal data that we collect about you, together with a description of the legal basis on which we undertake that processing.

- Log-in Details – We will process your personal data in order to allow you to log-in to your account and to access the relevant functionality on our website. This processing of your personal data will be on the basis of our legitimate interest in making the account function of our website available to you.

- AML/KYC – We will process your personal data in order to undertake anti-money laundering and know your customer checks. This processing of personal data will be based on either our statutory obligations or our legitimate interest in ensuring that our services are not used for inappropriate purposes.
- Purchases – We will process your personal data in order to allow you to make purchases on our website. This processing of your personal data will be on the basis that it is required in order for us to fulfil our obligations under the contract that we enter into with you to sell you the relevant bitcoin. We may also anonymise data in relation to purchases so that we can monitor how our business is functioning and to create statistical analysis of purchases. Where we anonymise your purchasing data, this will be on the basis of our legitimate interest in ensuring that we can operate our business effectively.
- Customer Services – We will process your personal data in order to respond to any comments, queries or complaints. This may also include processing your personal data for training or quality control purposes. We will process such personal data on the basis of our legitimate interest in responding to customer comments, queries and complaints and operating our customer services department.
- Email Address – Where you have given us your consent, we will process your email address in order to send you marketing emails that contain information in relation to our products and services, and products and services from selected third parties.
- Website Usage – We will process details about your use of our website in order for us to monitor the performance of the website and to improve its performance. Our processing of your personal data is on the basis of our legitimate interests in monitoring and improving the operation of our website.

Personal Data that We Require You to Provide

You are required to provide the following personal data:

- Legal Requirements – we may be required to gather information to comply with legal obligations. For example under anti-money laundering legislation, we may be required, in certain circumstances, to identify you and verify your identity, and to comply with other regulatory obligations that apply to Bitireland from time to time, for example monitoring your transactions on the platform. Failure to provide any such information will mean we may not be able to open your account, we may have to close or freeze your account, or we may not be able to process any orders for you on the platform.
- Other Contractual Requirements – We require that you provide us with the following details in order to enter into a contract with you for the purchase of bitcoin: Name, Email, Phone Number. If you do not provide us with these details, we will not be able to sell bitcoin to you.

Recipients of Data

We may disclose your personal data to various recipients in connection with the above purposes, including:

- Service providers – We rely on trusted third parties to help us run our business and to provide us with specialised services. This can include companies that provide IT services, like hosting

our website, managing our marketing email database or providing our AML/KYC check process. We also engage with companies that provide us with non-IT related services, such as legal advisors, accountants and consultants. Where our service providers have access to your personal data we ensure that they are subject to appropriate contracts and other safeguards.

- Regulators/Law enforcement agencies - We may disclose your personal data when required by law to regulators and/or law enforcement agencies.

Retention

We will keep your personal data in accordance with the following timeframes:

- Log-in Details - We will keep your log-in details for your account until you indicate to us that you wish to close your account, at which point they will be deleted.
- Purchases - We will keep details of your purchases for a minimum of [7] years from the date that you have made the purchase.
- Customer Services - We will keep details of your interactions with customer services for a period of [12] months, unless your interaction with customer services relates to a complaint that has not been resolved or in respect of which litigation is expected or in being, in which case we will keep your personal data until the complaint is resolved or the litigation has concluded.
- Email Address - We will keep a copy of your email address for marketing purposes until you unsubscribe from our marketing database.
- Website Usage - As we anonymise website usage data, you cannot be identified from the data, which means that we may keep the website usage data indefinitely.

Withdrawal of Consent

When we process your personal data on the basis of your consent, you are free to withdraw that consent at any time. You can withdraw your consent by contacting us using the contact details at the bottom of this notice. Please note that if you withdraw your consent we may not be able to continue providing you with our services.

Your Rights

You have the following rights, in certain circumstances, in relation to your personal data:

- *Right to access the data* - You have the right to request a copy of the personal data that we hold about you, together with other information about our processing of that personal data.
- *Right to rectification* - You have the right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update the information such that it is complete.
- *Right to erasure* - You have the right to request us to delete personal data that we hold about you. This is sometimes referred to as the right to be forgotten.

- *Right to restriction of processing or to object to processing* - You have the right to request that we no longer process your personal data for particular purposes, or to object to our processing of your personal data for particular purposes.
- *Right to data portability* - You have the right to request us to provide you, or a third party, with a copy of your personal data in a structured, commonly used machine readable format.

In order to exercise any of the rights set out above, please contact us at info@bitireland.ie

Complaints

You have the right to lodge a complaint with the Irish Data Protection Commissioner <https://www.dataprotection.ie/docs/Contact-us/11.htm> or your local supervisory authority.