

Privacy policy

Bitcoin & Litecoin Bank and its subsidiaries (“B&LBank”) respect and protect the privacy of the visitors to B&LBank’s website and B&LBank’s clients who use B&LBank’s Services. To ensure transparency, this Privacy Policy describes B&LBank’s (and its subsidiaries) information handling practices when you access content of B&LBank’s website located at bitcoinlitecoinbank.com (<https://bitcoinlitecoinbank.com>), and when you are a client of B&LBank or its subsidiaries.

Acceptance of the privacy policy

By accessing and using B&LBank’s Services, you signify that you have reviewed the terms of this Privacy Policy. Where B&LBank requires your consent to process your personal information, B&LBank will ask for your consent to the collection, use, and disclosure of your personal information as described further below. B&LBank may provide additional “just-in-time” disclosures or additional information about the data collection, use, and sharing practices of specific Services. These notices may supplement or clarify B&LBank’s privacy practices, or may provide you with additional choices about how B&LBank processes your data.

If you do not agree with, or you are not comfortable with, any aspect of this Privacy Policy, you should immediately discontinue access or use of B&LBank’s Services.

Changes to this privacy policy

B&LBank reserves the right to modify this Privacy Policy at any time, and when required by law, B&LBank will notify you of changes to this Privacy Policy. If B&LBank makes any material changes, B&LBank will notify you by email (sent to the email address specified in our database), or by means of a notice on B&LBank’s Services prior to the change becoming effective.

Personal information collected by B&LBank

Personal information is data that can be used to identify you directly or indirectly, or to contact you. B&LBank’s Privacy Policy covers all personal information that you voluntarily submit to B&LBank and that B&LBank obtains from B&LBank’s partners. This Privacy Policy does not apply to anonymised data, as it cannot be used to identify

you.

You may be asked to provide personal information at any time that you are in contact with any of the B&LBank companies. The B&LBank companies may share your personal information with each other and use it consistent with this Privacy Policy. They may also combine it with other information to provide and improve B&LBank's products, services, and content (see the section below).

Except as described in this Privacy Policy, B&LBank will not give, sell, rent, or loan any personal information to any third party.

Personal information collected

B&LBank collects personal information to provide you with B&LBank's Services. When B&LBank requires specific personal information from users, it is because such information is relevant for certain purposes. Any information you provide to B&LBank that is not required is voluntary.

For example, B&LBank collects personal information when you use or request information about B&LBank's Services, subscribe to marketing communications, request support, complete surveys, or sign up for a B&LBank event or webinar. B&LBank may also collect personal information from you offline, such as when you attend one of B&LBank's events, or when you contact your relationship manager. B&LBank may use this information in combination with other information B&LBank collects about you. You are free to choose whether to provide B&LBank with the types of personal information described below, but B&LBank may not be able to serve you as effectively, or offer you some or all of B&LBank's Services, when you choose not to share certain information with B&LBank.

Here are some examples of the types of personal information B&LBank collects and how B&LBank may use it:

- When you become a Client of B&LBank (or its subsidiaries, respectively), B&LBank, or B&LBank's external service provider may collect personal information. The following information may be collected: your name, date of birth, driver number, personal ID or passport, address, phone, email, full bank account details, tax or corporate identification number, company legal status, information that B&LBank needs for establishing the controlling person of operating legal entities and partnerships or regarding the identity of the beneficial owner of non-operating entities or information regarding individuals with signatory powers (first and last name, address, email, curriculum vitae), or authorised traders (first and last name, nationality, date of birth, etc.). B&LBank will use this information to fulfil your requests and provide the relevant Services.
- Whenever you contact B&LBank or respond to B&LBank's communications (e.g., email, telephone, in writing), B&LBank will receive your contact information and

any other personal information you choose to provide B&LBank. B&LBank will use such information to fulfil your requests or to provide Services.

How personal information is used

B&LBank's primary purpose in collecting personal information is to provide you with a secure, smooth, efficient, and customised experience. In general, B&LBank uses personal information to create, develop, operate, deliver, and improve B&LBank's Services, content and advertising, and for loss prevention and anti-fraud purposes. Examples of how B&LBank may use this information include:

- To provide you with B&LBank Services and the client support that you request.
- To process transactions and send notices about your transactions.
- To verify your identity by comparing your personal information against third-party databases.
- To send administrative or account-related information to you.
- To better understand B&LBank's clients and the way they use and interact with B&LBank-owned and/or B&LBank-operated websites and Services.
- To provide a personalised experience, and to implement the preferences that you request.
- To customise, measure, and improve B&LBank and the content and layout of B&LBank's website and applications.
- To enhance security, prevent fraud, monitor and verify identity or service access, and to combat spam or other malware or security risks.
- To deliver marketing, service update notices, and promotional offers based on your communication preferences.
- To communicate with you about B&LBank's events and/or B&LBank's partner events.
- To prevent and investigate potentially prohibited or illegal activities, and/or violations of B&LBank's posted user terms.
- To resolve disputes, collect fees, and troubleshoot problems.
- To comply with legal obligations.
- To enforce B&LBank's agreements with third parties.
- For quality control and staff training.

B&LBank will not use your personal information for purposes other than those B&LBank has disclosed to you without your permission. From time to time, B&LBank may request your permission to allow B&LBank to share your personal information with third parties. You may choose not to have your personal information shared with third parties where B&LBank relies on consent as the lawful basis for processing your personal information. You may also choose not to allow B&LBank to use your personal information for any purpose that is incompatible with the purposes for which B&LBank originally collected it or subsequently obtained your authorisation. If you choose to limit

the use of your personal information, certain features or B&LBank Services may not be available to you.

Information from third party sources

From time to time, B&LBank may obtain information about you from third party sources as permitted by applicable law, such as public databases and ID verification partners: B&LBank obtains information about you from public databases and ID verification partners for purposes of verifying your identity. ID verification partners use a combination of government records and publically available information about you to verify your identity. Such information includes your name, address, job role, public employment profile, credit history, status on any sanctions lists maintained by public authorities, and other relevant data. The legal basis for such processing is to comply with B&LBank's legal obligations, such as anti-money laundering laws. In some cases, B&LBank may process additional data about you based on public interest grounds to ensure B&LBank's Services are not used fraudulently or for other illicit activities. B&LBank also processes such information to provide support to you as part of B&LBank's contractual obligations to you. Lastly, B&LBank processes such information in the public interest because it helps B&LBank monitor, prevent, and detect fraud. Once B&LBank obtains such information from third parties, B&LBank will not subsequently share it with any other third parties except as described in this Privacy Policy. This information is shared with B&LBank's processors and corporate group, as necessary, to perform the Services.

Collection and use of information collected automatically

B&LBank receives and stores certain types of information automatically, such as whenever you interact with the Sites or use the Services. This information does not necessarily reveal your identity directly, but may include information about the specific device you are using, such as the hardware model, operating system version, web-browser software (such as Firefox, Safari, or Internet Explorer), and your Internet Protocol (IP) address/MAC address/device identifier.

For example, B&LBank automatically receives and records information on B&LBank's server logs from your browser, including how you came to and used the Services; your IP address; device type and unique device identification numbers, device event information (such as crashes, system activity and hardware settings, browser type, browser language, the date and time of your request and referral URL), broad geographic location (e.g., country or city-level location), and other technical data collected through cookies, pixel tags, and other similar technologies that uniquely identify your browser. B&LBank may also collect information about how your device has interacted with B&LBank's website, including pages accessed and links clicked.

B&LBank may use identifiers to recognise you when you arrive at the website via an external link, such as a link appearing on a third party site.

Please refer to the B&LBank Cookie Policy (<https://bitcoinlitecoinbank.com>) for more information about B&LBank's use of cookies.

How B&LBank protects and stores personal information

B&LBank understands how important your privacy is, which is why B&LBank maintains (and requires its service providers to maintain) appropriate physical, technical, and administrative safeguards to protect the security and confidentiality of the personal information you entrust to B&LBank.

B&LBank may store and process all or part of your personal and transactional information, including certain payment information, in Switzerland, and elsewhere in the world, where B&LBank's service providers are located. B&LBank protects your personal information by maintaining physical, electronic, and procedural safeguards in compliance with the applicable laws and regulations.

For example, B&LBank uses computer safeguards such as firewalls and data encryption, B&LBank enforces physical access controls to B&LBank's buildings and files, and B&LBank authorises access to personal information only for those employees who require it to fulfil their job responsibilities.

However, B&LBank cannot guarantee that loss, misuse, unauthorised acquisition, or alteration of your data will not occur. Please recognise that you play a vital role in protecting your own personal information. When registering with B&LBank's Services, it is important to choose a password of sufficient length and complexity, to not reveal this password to any third parties, and to notify B&LBank immediately if you become aware of any unauthorised access to or use of your account.

Furthermore, B&LBank cannot ensure or warrant the security or confidentiality of information you transmit to B&LBank or receive from B&LBank by Internet or wireless connection, including email, phone, or SMS, since B&LBank has no way of protecting that information once it leaves and until it reaches B&LBank. If you have reason to believe that your data is no longer secure, please contact B&LBank at the email address, mailing address, or telephone number listed at the end of this Privacy Policy.

How B&LBank protects and stores personal information

B&LBank takes care to allow your personal information to be accessed only by those who really need to in order to perform their tasks and duties, and to share with third parties who have a legitimate purpose for accessing it. B&LBank will never sell or rent your personal information. B&LBank will only share your data in the following circumstances:

- B&LBank may share your information with service providers under contract who help with parts of B&LBank’s business operations such as marketing and technology services. B&LBank’s contracts require these service providers to only use your information in connection with the services they perform for B&LBank, and prohibit them from selling your information to anyone else.
- B&LBank shares your information with financial institutions with which B&LBank partners to process payments you have authorised.
- B&LBank may share your information with companies, or other entities that B&LBank plans to merge with or be acquired by. Should such a combination occur, B&LBank will require that the new combined entity follow this Privacy Policy with respect to your personal information. You will receive prior notice of any change in applicable policies.
- B&LBank may share your information with any third parties where required to do so by applicable law or any court or other authority to which B&LBank is subject in any jurisdiction; or B&LBank believes in good faith that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity, or to investigate violations of the B&LBank Agreements and any other applicable policies.
- B&LBank may share your information with other third parties with your consent or direction to do so.

How B&LBank share personal information with other parties

You are entitled to review, correct, or amend your personal information, or to delete that information where it is inaccurate. You may do this by contacting your relationship manager. However, this right is limited where personal information is needed for regulatory purposes.

If you decide to end your client relationship, B&LBank will mark your account in B&LBank’s database as “Closed,” but will keep your account information in B&LBank’s database for a period of time as allowed by applicable law. This is necessary in order to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their account and opening a new account. However, if you close your account, your personal information will not be used by B&LBank for any further purposes, nor sold or shared with third parties, except as necessary to prevent fraud and assist law enforcement, as required by law, or in accordance with this Privacy Policy.

Rights in the relation to the use of your personal information

You have a right of access to the personal information that B&LBank holds about you under the Federal Act on Data Protection (and the General Data Protection Regulation)

and to some related information. You can also require any inaccurate personal information to be corrected or deleted.

You can object to B&LBank's use of your personal information for direct marketing purposes at any time, and you may have the right to object to B&LBank's processing of some or all of your personal information (and require them to be deleted) in some other circumstances.

If you wish to exercise any of these rights, please contact B&LBank as set out below.

Retention of personal information

B&LBank will retain your personal data for as long as is necessary for the purposes of B&LBank's business relationship with you, to perform B&LBank's contractual obligations to you, or if longer, as required for legal and regulatory purposes.

B&LBank has established internal policies for the deletion of data from client accounts following termination of a client's subscription to a Service.

Changes to this privacy policy

B&LBank may periodically post changes to this Privacy Policy on this page. B&LBank encourages you to visit this page often. When required by law, B&LBank will notify you of any changes to this Privacy Policy. If B&LBank makes any material changes B&LBank will notify you by email (sent to the email address specified in your account), or by means of a notice on B&LBank's Services prior to the change becoming effective.

How to contact us

If you have questions or concerns regarding this Privacy Policy, or if you have a complaint, you may contact at any time your client relationship manager, or you may contact B&LBank via support@bitcoinlitecoinbank.com.