

PRIVACY AND DATA PROTECTION POLICY



Bitconvert Ltd

(the "Company")

PRIVACY AND DATA PROTECTION POLICY

Bitconvert Limited, “the Company”, “we” or “us” operating under the Trading name and website www.thechnage.io, is responsible for the protection of the privacy and the safeguarding of clients’ personal financial information and data. By opening an account with the Company, the client acknowledges that the Company shall collect, process, store and use his/her personal information as explained below and in accordance to applicable data protection legislation (including but not limited to the General Data Protection Regulation (EU) 2016/679 (the “GDPR”))

For the purpose of GDPR, Bitconvert Limited is the data controller.

We have appointed a Data Protection Officer (DPO). If you have any questions about this Privacy Policy, including any requests to exercise your rights as a data subject, please contact the DPO in line with the Section “Enquiries” below.

The collection of personal information

The Company collects the necessary information required to open a client’s trading account, perform transactions and safeguard the clients’ assets and privacy and to provide clients with the services they require. In this respect, the Company can ask clients in certain circumstances, to gather information from banks and/or credit agencies, and/or clearing agencies and/or other sources which will help the Company to construct the clients’ profile based on their requirements and preferences in order to provide its services effectively. The Company may collect customer’s credit card data where is necessary to offer the services the customer opted for. In accordance with the recommendations of Payment Card Industry Security Standards Council, customer card details – are protected using Transport Layer encryption – TLS 1.2 and application layer with algorithm AES and key length 256 bit.

The information the Company collects includes information required to communicate with and identify its clients. The Company can also collect certain demographic information, including, date of birth, education, occupation, etc.

The other type of information that we collect is the Personal Information and this allows us to identify the end-user:

- Identifying documents- documents that we request from you for the proof of identity and your residency. Such information is collected in order to perform transactions through the services provided by the Company.
- Registration information- to provide you with our services, at the registration stage, we ask you to provide us with your name, e-mail, telephone number.
- Voluntary information- when using our services such as customer support or any other means of communication with us we collect the information that you voluntarily provide about yourself. Voluntary information is collected on the basis of your consent and you are not obliged to give us your consent and may also revoke this consent at any given time without consequence.
- Device data- this is the information that we collect from your device and that includes your IP address, unique identifiers and other information that relates to your activity while using the services of the Company. The IP information collected from your device is mainly required for security purposes of your account and the company’s itself. In other terms, the collection and process of this information serves the identification of any data breaches, misconduct, unauthorized use, and prevention of criminal activities.

We can record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you as per the requirements of the applicable laws and regulatory framework and/or the compliance obligations of the Company.



These recordings will be Company's sole property and will constitute evidence of the communications between the Company and you. Prior to any telephone conversation you will be informed that the call is being recorded for security purposes.

The Company holds two servers within the EU in two different locations to ensure protection and integrity of data. The Company always has full access to the data stored and phone communication.

All data held on you shall be held within the EU.

Use of personal information

The Company uses clients' personal information only as required to provide quality service and security to its clients. This information helps the Company to improve its services, customize browsing experience and enables it to inform its clients of additional products, services or promotions relevant to clients provided that the clients' have consented to the usage of this data for such purposes.

It shall be noted that the Company may anonymize or de-identify the collected information which, on its own, cannot personally identify you. In addition, the combination of Personal and non-Personal information is considered as Personal information and will be treated so while remaining combined.

Retention Period

The clients' personal data stored will be kept in the Company's records during our contractual relationship with the Client and after the termination of our contractual relationship, for the period of 5 (five) years as per the requirements of the Prevention of [Money Laundering and Funding of Terrorism S.L.373.01](#) and 9 years for taxation purposes as per the [Income Tax Management Act Arts 19 and 23\(12\)](#) In order to be able to provide to you the best of our services but also to comply with our legal obligations. Provided further that, the period of five years may be further extended, up to a maximum retention period of 10 (ten) years, where such extension would be considered necessary for the purposes of the prevention, detection, analysis and investigation of money laundering or funding of terrorism activities by the Financial Intelligence Analysis Unit, relevant supervisory authorities or law enforcement agencies.

Protection of personal information

Any personal information provided by the client to the Company will be treated as confidential and shared only within the Company and will not be disclosed to any third party except under any regulatory or legal proceedings. In case such disclosure is required to be made by law or any regulatory authority, it will be made on a 'need-to-know' basis, unless otherwise instructed by the regulatory authority. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information.

Non-affiliated third parties

The Company does not sell, license, lease or otherwise disclose clients' personal information to third parties, except as described in this Privacy and Data Protection Policy.

The Company reserves the right to disclose personal information to third parties where such disclosure is required by the Law and/or a, regulatory and or any other government authority. The Company may also disclose information as necessary to credit reporting or collection agencies as reasonably required in order to provide the services to Company and/or its clients.

In addition, the Company may engage third parties to help carry out certain internal functions such as account processing, fulfilment, client service, client satisfaction surveys or other data collection activities relevant to its business. Use of the shared information is strictly limited to the performance of the above and is not permitted for any other purpose. All third parties with which the Company shares



personal information are required to protect such personal information in accordance with all relevant legislation provisions of the GDPR and the Data Processing Legislation and in a manner similar to the way the Company protects the same. The Company will not share personal information with third parties which it considers will not provide its clients the required level of protection.

As part of using your personal information for the purposes set out above, non-affiliated third parties are:

- service providers and specialist advisers who have been contracted to provide us with services such as administrative, IT, analytics and online marketing optimization, financial, regulatory, compliance, insurance, research and/or other services,
- payment service providers and banks processing your transactions;
- auditors or contractors or other auditing advisers auditing, assisting with or advising on any of our business purposes.

In line with its GDPR obligations, the Company shares information in line with the above with the following:

- K. Treppides & Co Ltd
- Finanz Audit Services
- Phoenix Payments Ltd
- iSignthis Ltd
- EmerchantPay Ltd
- TrasactEurope
- SecureTrading Financial Services Ltd
- Aid Compliance Limited

Client's Rights

The Company uses all possible means to respect and protect its clients' privacy. At any time, the client may contact the Company and request:

- **Right to Transparent Information**, you have the right to be informed in a clear manner on any personal data pertaining to you that may be processed by us. Such information is being provided to you in this Privacy Policy.
- **Right to access**: request a confirmation as to whether personal data is being processed and if so to access such data.
- **Right to rectification**: you have the right to request from us the rectification without delay, of any inaccurate personal data pertaining to you.
- **Right to restrict processing**: You have the right to request the restriction or suppression of your personal data if: processing is unlawful; you are contesting the accuracy of data; the data is no longer required by us but you require us to keep it in order to establish, exercise, or defend a legal claim; or if you have previously objected to the processing. The Company, for the purpose of complying with the applicable Laws and Regulations, as described above, may store the personal data for a certain time period but will not use it.
- **Right to object**: You have the right to object to the processing of your personal data. The Company may be able to continue processing to comply with Laws and Regulations.
- **Right to withdraw consent**: Where we have obtained your consent to process your personal data you may withdraw this consent at any time. In this case, the Company will be forced to terminate its relationship with you as mentioned in this Policy.



- **Right of erasure:** You have the right to request erasure of your personal data. It shall be noted that the Company may refuse to satisfy your request as under any other legal obligations that the Company is subject to, we may be required to keep the information that you provide to us.
- **Right for data portability** allows you to obtain and reuse your personal data for your own purposes across different services. The Company shall provide such information to you free of charge however, in case of abuse of such right we may charge you a reasonable fee in proportion with your request.

In case you disagree with the way we handle your Personal Data and/or you want to exercise any of your rights above, please contact the Company's Data Protection Officer at dpo@thechange.io or by sending an e-mail to support@thechange.io and we shall reply to you within 14 calendar days. In the case you have unresolved concerns you have the right to complain to the relevant data protection authority. You can find details about how to do this on the following website:

For Malta <https://idpc.org.mt/en/Pages/Home.aspx>

MARKETING

The Company may exclusively on each client's consent, on occasion, seek to contact clients, whether by phone or by email, for the purpose of informing them of unique promotional offerings provided by the Company for the client.

Any person wishing to withdraw their consent and stop any further contact with the Company at any time whatsoever is entitled to do so by sending email to support@thechange.io. In case you unsubscribe and/or withdraw your consent the Company will remove your contact details from its marketing distribution list.

Restriction of responsibility

The Company is not responsible for the privacy policies or the content of sites to which fxvc.eu links and has no control of the use or protection of information provided by the clients or collected by those sites. Whenever a client elects to link to a co-branded website or to a linked website, the client may be asked to provide registration or other personal information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

Use of "COOKIES"

The Company uses cookies to secure clients' trading activities and to enhance the performance of the www.thechange.io website.. The cookies used by the company are:

- **"persistent cookies"** - only read by our website, are stored on your device for a fixed time period and are not deleted when the browser is closed. We use these cookies to know who you are for your next visits allowing us to know your preferences the next time you log-in.
- **"session cookies"** - these are only stored while the browsing session lasts enabling the normal use of the system and are deleted when the browser is closed.

Please note that you may remove the cookies following your browser settings however, disabling of cookies may limit your online experience as well as the functionality of some of the features for the services we provide may be low.

The Company may share website usage statistics with reputable advertising companies and with its affiliated marketing companies. It is noted that the information collected by such advertising companies is not personally identifiable. To administer and improve the www.thechange.io website, the Company may use third parties to track and analyse usage and statistical volume information. The third party may use cookies to track behaviour and may set cookies on behalf of the Company. These cookies do not



contain any personally identifiable information.

Minors

To use our services a person must be above the age of 18.

The Company reserves the right to access and verify any Personal Data collected and discard any such data in case that the person who shared it with us is a minor. Please contact us at support@thechange.io in case you have any grounds to believe that a minor has shared any Personal Data with us.

Privacy Policy Updates

The Company reserves the right to update this Privacy Policy from time to time. In the event that the Company materially changes this Policy including how it collects, processes or uses clients' personal information, the revised Privacy Policy will be uploaded on the Company's website so please review it frequently. In this respect, the clients shall be notified of major changes via email. Any dispute over the Company's Privacy Policy is subject to this notice and the Client Agreement. The Company encourages its clients to periodically review this Privacy Policy so that they are always aware of what information the Company collects, how it uses it and to whom it may disclose it, in accordance with the provisions of this Policy.

Provision of Data – Obligation

Since we require your data for the purposes of accepting and carrying out a relationship with you and fulfilling our contractual and legal obligations, should you choose not to provide us with such data, we might not be in a position to enter into a business relationship with you and fulfil the Terms and Conditions applicable between us and our obligations thereunder. Anti-money laundering obligations require us to verify your identity at certain intervals, for example, by means of your passport and to record your personal details. In order for us to be able to comply with this statutory obligation, we will ask you to provide us with the necessary information and documents and notify us without undue delay of any changes that may arise during the course of the business relationship. Should you choose not to provide us with such data, we might not be in a position to enter into or continue our business relationship and fulfil the Terms and Conditions applicable between us and our obligations thereunder as we would be in breach of our anti-money laundering and funding of terrorism obligations.

Enquiries:

If you have any enquiries regarding the Company's Privacy and Data protection Policy please email the Company's Data Protection Officer at dpo@thechange.io email.

The Company shall try to respond to all requests within 14 calendar days. Please note that it may take us longer than 14 calendar days if your request is particularly complex or you have made a number of requests. In this case, we will notify you within 14 (fourteen) calendar days of the receipt of your request and keep you updated.

If you are not satisfied with our response to your complaint, you have the right to lodge a complaint with the supervisory authorities mentioned above.

