

## Privacy Policy

When you visit our website [www.bielik.io](http://www.bielik.io) and/or use our mobile applications, Bielik Vault sp. z o.o. based in Warsaw, address: 26 Śmiała Street, 01-523 Warsaw with KRS no. 0000973604. NIP. 5252910690. REGON. 522217296 ("**Bielik**", "**we**") is the data controller and processes your personal data. Bielik values your privacy and ensures due diligence in the processing and protection of your personal data.

In processing your personal data, we comply with relevant privacy laws, including Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016. (RODO) In this privacy statement ("**Privacy Policy**"), we explain what types of personal data we collect, why we collect such data, how we handle personal data, and describe what rights you have in connection with the processing of your personal data.

*The privacy policy was last revised on January 25, 2024.*

### 1. CATEGORIES OF DATA PROCESSED, PURPOSES AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

By using our website and its functionalities, various categories of personal data may be processed. Bielik collects your data to the extent necessary to provide the services described below. We process your personal data on different legal bases, depending on the purpose of the processing/functionality you use. You can find the categories of data we process, the purposes and the legal bases for processing below. We may process your personal data for the following purposes:

- **Account creation**

Through our website, you can create an account on our online platform. This account allows you to buy, sell, store cryptocurrencies and cash, and make cash deposits and withdrawals. To create an account, we will ask you to provide your name, email address, date of birth, password and nationality.

When you create an account, we process your personal data in order to conclude and perform the contract for the provision of the online account service, i.e. on the basis of Article 6(1)(b) of the RODO

Providing personal data is voluntary, but necessary to create an account.

- **Buying and/or selling cryptocurrencies and depositing and withdrawing funds**

You can buy and sell cryptocurrencies through our website. To do so, you must log in to your online account using your email address and password. When you buy and/or sell cryptocurrencies and make deposits or withdrawals of funds, we process the following personal information: name, payment account number, address, official personal

document number, customer identification number or date and place of birth, login, email address.

We process your personal data in order to perform the contract concluded with us, i.e. on the basis of Article 6(1)(b) of the RODO.

Provision of personal data is required in connection with applicable laws. Provision of data is voluntary, but necessary for the sale and/or purchase of cryptocurrencies and the deposit and withdrawal of funds.

We also process the personal data of the recipient of the transaction: the recipient's name; and the recipient's payment account number.

- **Verification procedure**

Due to current regulations, a mandatory step in setting up an account, making a purchase/sale, and depositing or withdrawing money is customer verification. In order to complete this verification procedure, we need your name, email address, date of birth, country of residence and phone number, citizenship, PESEL number, ID document series and number, residential address, image.

As part of your verification, we will also ask you to provide us with a copy of your passport or ID card and address information. If necessary, you will need to provide us with additional verification documents. During the verification procedure, we process your personal data in order to fulfill a legal obligation, i.e. under Article 6(1)(c) of the DPA.

Provision of personal data is required in connection with applicable laws. Provision of data is voluntary, but necessary to use the platform.

- **Monitoring customers and transactions**

The Anti-Money Laundering and Countering the Financing of Terrorism Act requires us to apply so-called financial security measures, i.e. methods by which we are to detect possible attempts to use our portal for money laundering or terrorist financing. To this end, we must, among other things, analyze the transactions carried out on our site for such purposes, and in certain cases obtain additional explanations or documents from you.

During monitoring, we process the following personal data: names and surnames, e-mail address, date of birth, country of residence and telephone number, PESEL number, series and number of identity document and address of residence.

We process your personal data processed in connection with transaction monitoring in order to fulfill a legal obligation, i.e. under Article 6(1)(c) of the DPA.

Provision of personal data is required in connection with applicable laws. Provision of data is voluntary, but necessary for the sale and/or purchase of cryptocurrencies.

- **Contact with Bielik**

If you have any questions for us, you can contact us via email. You can also contact us through our social media channels or by filling out our contact form. In order to respond to a question sent via the contact form, we will process your name, email address and other personal information contained in the body of your message.

If you contact us, we process your personal data on the basis of our legitimate interest in responding to inquiries addressed to us, i.e. on the basis of Article 6(1)(f) of the RODO.

Provision of data is voluntary, but necessary to handle your inquiry made through the contact form.

- **Other objectives**

We may also process your personal data for the following purposes:

- for marketing purposes, e.g. on social media (LinkedIn), i.e. on the basis of legitimate interest (Article 6(1)(f) RODO consisting in promoting Bielik's activities to interested persons;
- to comply with our legal and regulatory obligations - based on Article 6(1)(c) of the RODO;
- Establish, investigate or defend against possible legal claims - based on Article 6(1)(f) of the RODO.

When we process your personal data for these purposes, we process it due to a legal obligation and/or legitimate legal interest.

We may from time to time review your personal information stored on our systems - including content and other information related to emails and other communications with us - in order to comply with legal obligations and on the basis of our legitimate interest in ensuring compliance with legal and regulatory obligations and protecting business, as described above.

## **2. PERIOD OF PROCESSING OF PERSONAL DATA**

As a rule, we keep your personal data only for the period of time necessary to fulfill the purpose for which the data was collected, as described in the Privacy Policy. We keep your data for the duration of the service, or for the duration of the contract, until you withdraw the consent you have given, or make a reasoned objection to the processing of your personal data, when the basis for the processing is Bielik's legitimate interest, and your legitimate interest outweighs our legitimate interest. After the expiration of the

retention period or when the data is no longer necessary for the purposes for which it was collected, the personal data will be deleted.

The storage period for personal data may be extended each time by the period of the statute of limitations for claims, if the processing of personal data is necessary for Bielik to pursue possible claims or defend against such claims.

Bielik has a legal obligation to keep personal data used for identification, verification and notification of authorities for a period of 5 years after the business relationship ends.

### **3. RECIPIENTS OF DATA AND TRANSFER OF DATA OUTSIDE THE EOG**

We may share your personal information with other parties, including:

- Bielik Operations sp. z o.o., which provides operational services to us, particularly related to the provision of payment services, such as the provision of cloud services, support in meeting regulatory requirements, and the provision of maintenance services;
- service providers, including hosting providers, payment service providers, email service providers who host our website or other IT systems or otherwise store or process your information on our behalf, under strict confidentiality and security conditions;
- specialized entities performing the KYC (Know Your Customer) process on behalf of Bielik, in exceptional circumstances when we are required to do so by law or court rulings or administrative decisions - competent law enforcement, judicial, regulatory authorities or parties to litigation.

If we have a reasonable suspicion that criminal funds are being collected on our site, or we see a case of alleged money laundering or terrorist financing, we are obliged to report it to the relevant services (prosecutor's office or the General Inspector of Financial Information).

Disclosure may involve the transfer of your personal data abroad, including outside the European Economic Area. In such cases, when we transfer personal data to other members of the Bielik Group or to our service providers, we will ensure that our arrangements with them are governed by agreements or transfer mechanisms designed to ensure that your personal data is protected at the same level (including, where applicable, by agreement under terms approved by the European Commission for this purpose).

For more information on the existing safeguards implemented by Bielik to ensure the processing of personal data in accordance with applicable regulations, and on how to

obtain a copy of the data or where and how to access the data, please contact us by mail at the indicated address of our registered office or by e-mail at [dpo@bielik.io](mailto:dpo@bielik.io).

#### **4. SECURITY**

We take appropriate technical and organizational security measures to protect your personal data. In particular, we use the following measures:

- Access to personal data requires a username and password;
- we use physical measures to protect access to the systems where personal data is stored;
- we use secure connections (Transport Link Security or TLS) to encrypt all information between you and our site when you enter personal information;
- We commission specialized entities to conduct regular penetration tests and security reviews;
- we use multi-component authentication where appropriate; and
- Train employees on best safety practices.

#### **5. THIRD PARTY WEBSITES**

The Privacy Policy does not apply to third-party websites linked to this site through links. We cannot guarantee that these third parties will handle your personal information in a safe and careful manner. We recommend that you read their privacy statements before using these sites.

#### **6. AUTOMATED DATA PROCESSING**

We may perform automated decision-making, including profiling based on your personal information.

#### **7. YOUR RIGHTS**

Your rights related to the processing of your personal data:

- You have the right to request access to your personal data
- if your data is inaccurate or no longer relevant, you may request that any of your inaccurate personal data be corrected, supplemented or deleted (right of rectification and completion);
- You have the right to restrict our processing of your personal data;
- You have the right to delete your personal data,

- to the extent that the processing of your personal data is based on Bielik's legitimate interests, you have the right to object to the processing of your personal data,
- to the extent your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such marketing, including profiling to the extent it is related to such direct marketing;
- You have the right to obtain a copy of your personal data in an ordinary machine-readable format for transfer to another organization (right to data portability);
- You have the right to human intervention in automated processing and not to be subject to profiling which means you have the right to human review of the decisions made
- The right to lodge a complaint to the supervisory authority - the President of the Office for Personal Data Protection (2 Stawki Street, 00-193 Warsaw).

We may ask you to provide identification and/or other personal information to establish your identity and ensure that no one other than you is trying to exercise your privacy rights.

We follow the legal deadlines for processing the application. This means that normally a request will be processed within one month. This period may be extended by another two months due to the complexity of the request or the number of requests. If the response period is extended, you will be notified.

In some cases, when there is no legal basis for the request, we may reject such a request, the applicant will be informed.

## **8. COOKIES**

When you visit our website [www.bielik.pl](http://www.bielik.pl) and/or use our mobile applications, we may obtain information about you through "cookies," which are small files sent by the website and stored on your device (such as a computer, cell phone, tablet, etc.). Cookies may contain your personal information sent to your device. They help improve our website and provide a better and more personalized service. Some of the cookies we use are essential to the operation of the website. For more information about what cookies we use, for what purpose, and how to accept or reject them, please see our cookie policy.

## **9. CONTACT INFORMATION**

In case you still have questions and/or suggestions after reading our Privacy Policy / Cookie Policy, you can contact us

- by mail to the above address of our registered office
- by email to the following email address: dpo@bielik.io.

#### **10. PRIVACY POLICY CHANGES**

The Privacy Policy is subject to change, in particular if the need or obligation to make such changes would result from a change in applicable laws, including changes in data recipients.

Customers whose data is processed in accordance with this Privacy Policy will be notified of its changes with reasonable advance notice by e-mail.