

Privacy Policy

When you visit our website www.bielik.io and/or use our mobile applications, Bielik Vault sp. z o.o. with its registered office in Warsaw, address: ul. Śmiała 26, 01-523 Warsaw, KRS no. 0000973604, NIP 5252910690, REGON 522217296 ("Bielik", "we") is the data controller and processes your personal data. Bielik values your privacy and takes appropriate care in the processing and protection of personal data. When processing your personal data, we comply with the applicable data protection laws, including Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR).

In this document ("Privacy Policy") we explain what types of personal data we collect, why we collect such data, how we handle personal data, and we describe the rights you have in connection with the processing of your personal data.

This Privacy Policy was last amended on 30 June 2026.

1. Categories of personal data processed, purposes and legal bases for processing personal data

When you use 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 various legal bases, depending on the purpose of processing or the functionality you use. The categories of data we process, and the purposes and legal bases for processing, are set out 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. To create an account, we will ask you to provide your first and last 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 account services agreement, i.e. on the basis of Article 6(1)(b) GDPR.

Providing personal data is not a statutory requirement, but is necessary to create an account.

Deposits and withdrawals of funds

In order to make deposits or withdrawals of funds, we process the following personal data: first and last name, payment account number, address, government-issued ID number, customer identification number or date and place of birth, login, and email address.

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

Providing personal data is required in connection with applicable legal provisions. Providing data is not a statutory requirement in itself, but is necessary to make deposits and withdrawals of funds.

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

To enable you to buy and sell cryptocurrencies on the platform, we share your personal data with a licensed cryptocurrency service provider, BitGo Europe GmbH, with whom, by registering an account and accepting the Terms and Conditions, you conclude separate agreements for the custody of cryptocurrencies and for the provision of trading services. Sharing your data takes place on the basis of the controller's legitimate interest, i.e. Article 6(1)(f) GDPR.

Verification procedure

Due to applicable regulations, a mandatory step in creating an account and making a deposit or withdrawal of funds is customer verification. To complete this verification procedure, we need your first and last name, email address, date of birth, country of residence and telephone number, citizenship, PESEL (Polish national identification number), the series and number of your identity document, residential address, and image.

As part of the verification carried out, we will also ask you to provide us with a copy of your passport or identity card and your address details. If it proves necessary, you must provide us with additional verification documents. During the verification procedure we process your personal data in order to fulfil a legal obligation, i.e. on the basis of Article 6(1)(c) GDPR. Providing personal data is required in connection with applicable legal provisions.

Providing data is not a statutory requirement in itself, but is necessary to use the platform.

Customer and transaction monitoring

The Polish Anti-Money Laundering Act requires us to apply customer due diligence measures, i.e. methods by which we are to detect any attempts to use our portal for money laundering or terrorist financing. For this purpose we must, among other things, analyse the transactions carried out on our service from this perspective, and in specific cases obtain additional explanations or documents from you.

During monitoring we process the following personal data: first and last names, email address, date of birth, country of residence and telephone number, PESEL (Polish national identification number), the series and number of your identity document, and residential address.

We process your personal data in connection with transaction monitoring in order to fulfil a legal obligation, i.e. on the basis of Article 6(1)(c) GDPR.

Providing personal data is required in connection with applicable legal provisions.

Contacting Bielik

If you have any questions for us, you can contact us by email at dpo@bielik.io. You can also contact us through our social media channels or by completing our contact form. To respond to a question submitted through the contact form, we will process your first name, last name, email address and other personal data contained in the content of your message.

When you contact us, we process your personal data on the basis of our legitimate interest in responding to enquiries directed to us, i.e. on the basis of Article 6(1)(f) GDPR.

Providing data is not a statutory requirement, but is necessary to handle your enquiry made through the contact form.

Other purposes

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

- for marketing purposes, e.g. via social media (LinkedIn), i.e. on the basis of a legitimate interest (Article 6(1)(f) GDPR) consisting in promoting Bielik's activities to interested persons;
- complying with our legal and regulatory obligations, on the basis of Article 6(1)(c) GDPR;
- establishing, pursuing or defending against potential legal claims, on the basis of Article 6(1)(f) GDPR.

When processing your personal data for these purposes, we process it on the basis of a legal obligation and/or a legitimate legal interest. From time to time we may review your personal data stored in our systems, including the content and other information related to emails and other communications with us, in order to fulfil legal obligations and on the basis of our legitimate interest in ensuring compliance with legal and regulatory obligations and protecting the business, as described above.

2. Period of processing personal data

As a rule, we store your personal data only for the period necessary to achieve the purpose for which the data was collected, as described in this Privacy Policy. We store your data for the duration of the provision of the service or for the term of the agreement, until the consent granted is withdrawn or a justified objection to the processing of personal data is raised where the basis for processing such data is Bielik's legitimate interest and your legitimate interest prevails.

The period of storing personal data may in each case be extended by the statute of limitations for claims, if the processing of personal data is necessary for pursuing potential claims or defending against such claims by Bielik.

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

3. Data recipients and transfers outside the EEA

We may transfer your personal data to other entities, including:

- service providers, including hosting service providers, payment service providers and email service providers, who host our website or other IT systems or otherwise store or process your information on our behalf, under strictly defined conditions of confidentiality and security;
- specialised entities carrying out the KYC (Know Your Customer) process on Bielik's behalf; and, in exceptional circumstances where we are required to do so under the law or court judgments or administrative decisions, the relevant law enforcement, judicial or regulatory authorities or parties to litigation;
- BitGo Europe GmbH, a licensed cryptocurrency service provider that provides cryptocurrency custody services and trading services to platform users.

If we have a reasonable suspicion that funds derived from crime are being collected on our service, or if we identify a case of suspected money laundering or terrorist financing, we are obliged to report this to the relevant authorities (the public prosecutor's office or the General Inspector of Financial Information (Polish FIU)).

Disclosure of data may involve the transfer of your personal data abroad, including outside the European Economic Area. In such cases, where 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 data transfer agreements or mechanisms designed to ensure that your personal data is protected to the same standard (including, where applicable, on the basis of an agreement on terms approved for this purpose by the European Commission).

You can obtain more information about the safeguards implemented by Bielik to ensure that personal data is processed in accordance with applicable law, and about the options for obtaining a copy of the data or where and how the data is made available, by contacting us by post at the indicated address of our registered office or by email at: dpo@bielik.io.

4. Security

We take appropriate technical and organisational security measures to protect users' personal data. In particular, we apply the following measures:

- access to personal data requires a username and password;
- we apply physical measures to protect access to the systems in which personal data is stored;
- we use secure connections (Transport Layer Security, or TLS) to encrypt all information between the user and our website when entering personal data;
- we commission specialised entities to carry out regular penetration testing and security audits;
- we use multi-factor authentication where applicable; and
- we train employees in security best practices.

5. Third-party websites

This Privacy Policy does not apply to third-party websites linked to this website via links. We cannot guarantee that these third parties will handle your personal data securely. Before using these websites, we recommend that you review their privacy policies.

6. Automated data processing

We may carry out automated decision-making, including profiling, based on your personal data.

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 the data is incorrect or no longer relevant, you may request the correction, completion or deletion of any of your inaccurate personal data (the right to rectification and completion);
- you have the right to restrict our processing of your personal data;
- you have the right to have your personal data erased;

- to the extent that the basis for processing your personal data is Bielik's legitimate interest, you have the right to object to the processing of your personal data;
- to the extent that 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 that it is related to such direct marketing;
- you have the right to obtain a copy of your personal data in a commonly used, machine-readable format so that you can transfer it to another organisation (the right to data portability);
- you have the right not to be subject to a decision based solely on automated processing, including profiling, and to obtain human intervention in such decisions;
- the right to lodge a complaint with the supervisory authority, the President of the Office for Personal Data Protection (ul. St. Moniuszki 1A, 00-014 Warsaw).

We may ask you to provide an identity document and/or other personal data in order to establish your identity and to ensure that no one other than you is attempting to exercise your privacy rights.

We comply with the statutory deadlines for processing a request. This means that a request will usually be processed within one month. This period may be extended by a further two months, due to the complex nature of the request or the number of requests. If the response period is extended, you will be notified.

In some cases, where there is no legal basis to fulfil a request, we may reject such a request; the applicant will be informed of this.

8. Cookies

When you visit our website www.bielik.io and/or use our mobile applications, we may obtain information about you using "cookie" files, which are small files sent by a website and stored on your device (such as a computer, mobile phone, tablet, etc.). Cookies may contain your personal data transferred to your device. They help us improve our website and provide a better and more personalised service. Some of the cookies we use are necessary for the website to function. More information about which cookies we use, for what purpose, and how to accept or reject them, can be found in the cookie policy.

9. Contact information

If, after reading our Privacy Policy or Cookie Policy, you still have questions or suggestions, you can contact us:

- by post at the address of our registered office indicated above;
- by email at the following email address: dpo@bielik.io.

10. Changes to the Privacy Policy

This Privacy Policy may change, in particular where the need or obligation to make such changes arises from a change in the relevant legal provisions, including changes to the data recipients.

Customers whose data is processed in accordance with this Privacy Policy will be notified of changes to it with appropriate advance notice, by email.