

# Privacy Policy

When you access the website, the system of **Bitrust LLC** (hereinafter referred to as “Bitrust” or “we”) automatically assesses your (users’) visit to this website and the interests you show in our services and products while browsing our website.

We continuously monitor and safeguard any personal information that is collected, processed, and/or used during your visit to our website and thereafter.

The terms and conditions for the processing of personal data while using the website are governed by this Privacy Policy (hereinafter referred to as the “Policy”), which has been prepared in accordance with the applicable legislation of Georgia.

## **Consent to Privacy Policy**

Please note that by accessing the website, you agree to this Privacy Policy. If you do not agree to the Policy, do not continue to use subsequent pages of the website. Otherwise, it will be considered that you have read, understood, and agreed to the Policy posted on the website.

This Policy may be updated from time to time. Therefore, please review it regularly. To find out when the Privacy Policy was last updated, see the last paragraph of the document.

## **What is the Purpose of This Policy and What is Its Scope?**

It is important to us to protect the personal data of individuals who use our website. Accordingly, we have developed this Policy to help users understand how and what kind of information is collected when using the website, and for what purposes we may collect, transfer, and/or otherwise make this data available. Bitrust also takes all reasonably necessary and appropriate measures to ensure the security of your data.

This Privacy Policy applies to all types of information that Bitrust collects as a result of your use of the website. Please note that this Policy does not apply to third-party websites/applications that are not affiliated with Bitrust, even if links to such websites/applications are accessible through our website. If you choose to use such third-party platforms, we recommend reviewing their privacy policies, as Bitrust has no control over their content, privacy practices, or policies, and therefore cannot be held responsible for their actions.

The terms of this Policy apply in addition to any other statements and/or contractual terms (if any) that may be entered into as part of your contractual relationship with Bitrust, as well as any other applicable and binding laws and/or regulations.

## **What Information Do We Collect from You and for What Purpose?**

When you visit our website, our server automatically records certain details about your visit (e.g., without limitation, your IP address, the website from which you accessed our platform, the type of Internet browser used during your visit, the type of device on which the browser is installed, the specific pages of the Bitrust website you viewed, the date and duration of your visit, etc.). In addition, we collect personal data that you voluntarily provide through the Bitrust website - for example, when you enter your personal information (such as name, surname, gender, address, email address, phone/fax number, etc.) on the registration page, or when you subscribe to receive updates via our website. We may also receive your personal data from third parties if you are their client or subscriber.

## **Video Surveillance and Audio Recording**

For the purposes of ensuring the safety of individuals, protection of property and confidential information, prevention of unlawful acts, and monitoring the quality of services, and in full compliance with the Law of Georgia on Personal Data Protection, Bitrust carries out video surveillance of the building's external perimeter, entrances, service areas, and workspaces. Additionally, audio recording is conducted during telephone conversations and other voice communications with Bitrust.

At service locations and during communication with Bitrust, the data subject is duly informed of the ongoing video surveillance and/or audio recording through appropriate signage, notifications, or verbal information. By continuing to use the services or communicate with Bitrust, the data subject acknowledges the necessity of such processing activities and expresses informed and explicit consent to the video and audio data being collected and processed for the aforementioned purposes.

## **How Do We Use Your Personal Data?**

We use your personal data solely for the following purposes:

- For the technical administration, research, and development of the website;
- For administrative and marketing purposes;
- In connection with other electronic channels of Bitrust for the purposes mentioned above;
- To provide you with information about our services and products; and
- In other cases specified in this Policy.

## **Legal Basis for Processing Personal Data:**

The legal basis for processing your personal data includes the following:

- User Consent – when you voluntarily provide us with information, such as during registration or when subscribing to our newsletter;
- Performance of a Contract or Steps Prior to Entering into a Contract – when processing is necessary to provide our services or respond to your requests;
- Compliance with a Legal Obligation – when processing is required to fulfill our legal obligations;
- Legitimate Interests – when processing is necessary to improve our services, ensure technical security, and prevent fraud, provided that your fundamental rights and freedoms are not infringed.

### **Who Processes the Data?**

•Bitrust (Bitrust LLC, Identification Number: 405470431) is the data controller for the data collected through the website. In specific cases, data processors may be engaged to perform technical services on our behalf (e.g., hosting, analytics, email systems, etc.). These processors act solely based on our instructions and under our control.

Bitrust ensures compliance with all applicable laws and regulations regarding the protection of personal data.

### **How Do We Collect and Store Information About You?**

Bitrust uses cookies and similar tracking technologies (such as tags) to collect the information described in the section “What information do we collect from you and for what purpose?” and to understand how users interact with our website.

We aim to continuously improve the quality of our services and your user experience, while also ensuring your security. Cookies help us personalize, enhance, and secure your experience when using our website or other remote platforms. Specifically, cookies are used to:

- Simplify navigation;
- Deliver information in your preferred format;
- Improve search functionality;
- Enable secure user login;
- Support marketing efforts;
- Optimize the design and layout of the website;
- Better tailor the content to your preferences.

Please note that cookies may remain active during your future visits to the Bitrust website. However, we cannot guarantee this in all cases.

In many cases, you can manage or disable tracking technologies through your browser settings. Please ensure that your browser settings reflect your preferences.

Please note, that refusing or disabling tracking technologies may negatively affect the availability, performance, or functionality of certain features or services on the Bitrust website.

You have the option to consent or decline the use of cookies, and you may also manage the specific purposes for which cookies are used (e.g., choosing not to allow cookies for analytics and/or marketing purposes).

### **To Whom Do We Share Information Collected About You from the Website?**

To achieve the purposes outlined above, Bitrust may share your information with its affiliates, its or its affiliates' agents, and/or third parties that provide services to Bitrust. These affiliates, agents, and third-party service providers who have access to your personal data collected through the Bitrust website are required to protect its confidentiality in accordance with the applicable laws of Georgia.

Please note that when personal data is transferred internationally, we ensure compliance with all applicable laws and regulations. For example, we may enter into appropriate agreements with recipients of your personal data to ensure that adequate safeguards are in place. Additionally, we may transfer your information to government bodies, regulatory authorities, or other entities in accordance with applicable laws, regulations, court orders, or official requests, as well as pursuant to instructions issued by government authorities or within the framework of any similar process conducted under applicable law.

### **What Security Measures Have We Implemented to Protect Your Information Collected Through the Website?**

Bitrust has implemented all reasonable technical and organizational security measures available to it in order to ensure that your personal data collected through the website is protected from unauthorized access, use, loss, and/or destruction.

### **What Is Our Policy Regarding the Storage of Electronic Messages?**

All electronic messages (such as SMS, emails, etc.) sent by or to Bitrust are automatically stored by the system in a dedicated electronic journal that carries the status of legal evidence. Bitrust safeguards these messages using reasonable technical and organizational measures, and access to them is granted only in specific cases by authorized personnel in strict compliance with applicable laws and regulations.

The data is retained only for as long as necessary to fulfill its intended purpose or for the period required by law.

### **What should you consider when sending data over the Internet?**

Please note that the Internet is generally not considered a fully secure environment. Information sent over the Internet - whether through a website, electronic messaging system, or other means - may be subject to unauthorized access by third parties. This could lead to the disclosure, alteration, or loss of the information transmitted, as well as other technical errors.

Regardless of whether the sender and recipient are located in the same country, information sent over the Internet may be transmitted across international borders. Consequently, your data may be transferred to countries with different (either weaker or stronger) data protection laws than those in your own jurisdiction.

Please be aware that Bitrust cannot be held responsible for the security of any information transmitted over the Internet during communication with us. To protect your data's confidentiality, you are advised to select the communication methods you consider most appropriate when interacting with Bitrust.

### **What is our policy regarding the privacy of information about individuals under the age of 18?**

Please note that Bitrust does not provide services to individuals under the age of 18, and accordingly, our website does not knowingly collect personal data from such individuals. In compliance with applicable law, individuals under the age of 18 must obtain verifiable consent from a parent or legal guardian before submitting any personal data through the website.

### **How can you access or view your personal data?**

Subject to applicable laws and regulations, you have the right to:

- Verify at any time whether we are processing your personal data;
- Request a copy of the personal data we hold about you;
- Request the correction of any inaccuracies in your personal data;
- Request a temporary restriction of the processing of your personal data;
- Request a complete restriction of the processing of your personal data;
- Request the deletion (erasure) of your personal data.

If you have any requests related to the processing of your personal data, please send them to the following email address: [support@bitrust.exchange](mailto:support@bitrust.exchange)

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