



Bitcoin Suisse

Data Protection Policy

The websites <https://merchant.bitcoinsuisse.ch> and <https://paymentterminal.bitcoinsuisse.ch> are produced and published by Bitcoin Suisse AG, Grafenauweg 12, 6300 Zug, Switzerland ("Bitcoin Suisse", "we", "us"), registered in the Commercial Register of the Canton of Zug under No. CHE-472.481.853.

We are therefore responsible for the collection, processing and use of your personal data in accordance with the law. We take data protection very seriously and are committed to the protection of your personal data. Consequently, we comply with the applicable data protection laws of Switzerland and the European Union (in particular the General Data Protection Regulation, GDPR).

We would like to inform you below about how we handle your personal data. Please be aware that the following information may be reviewed and amended from time to time. We therefore recommend that you consult this Data Protection Policy on a regular basis.

1) Extent and purpose of the collection, processing and use of personal data

a) When visiting our websites

When you visit our websites, our servers temporarily store each access in a log file. The following data is collected and stored, without any action on your side, until it is automatically deleted after 12 months:

- the IP address of the requesting computer,
- date and time of access,
- name and URL of the data accessed,
- the website from which access is made to our domain,
- your computer's operating system and the browser you use,
- the country from which access to our website is made,
- the Status-Code, and
- the name of your Internet provider.

This data is collected and processed for the purpose of allowing the use of our website (establishing a connection), ensuring system security and stability in the long term, and allowing the optimization of our Internet offering as well as for internal statistical purposes.

The aforementioned information is not linked to or stored with any personal data. Only in the event of an attack on the website's network infrastructure or where unauthorized or abusive use of the website is suspected will the IP address be evaluated for clarification and defensive purposes and, where necessary, used within the framework of criminal proceedings for identification and to bring legal action against the users concerned under civil and criminal law.

We rely on our legitimate interests within the meaning of Art. 6 para. 1 lit. f GDPR to process the data for these purposes.

b) When you register as a Customer (only <https://merchant.bitcoinsuisse.ch>)

To use the online Payment Gateway, you can open an account. When registering a new account, we collect the following data:

- Name*,
- Address*,
- Postal code*,
- City*,
- County,
- Country*,
- Phone*,
- Contact Name*,
- Contact Phone*,
- Contact E-Mail address*.

Personal data marked with * must be provided truthfully and mandatorily.

We collect these data to fulfil our pre-contractual and contractual obligations within the meaning of Art. 6 para. 1 lit. b GDPR. You can object to this data processing at any time (see "Contact" Section). This would however, result in a revocation of the account.

c) When you create your Merchant Interface (only <https://merchant.bitcoin-suisse.ch>)

By using our online Payment Gateway, you can create your merchant interface. When you create this interface, we collect the following data:

- Name*,
- Address*,
- Postal code*,
- City*,
- County,
- Country*,
- Phone*,
- Contact Name*,
- Contact Phone*,
- Contact E-mail address*,
- Specifications for the invoicing and payment processing,
- Language*,
- Shared Secret*.

Personal data marked with * must be provided truthfully and mandatorily.

This information is necessary to create the invoices and use the functionalities of the Payment Gateway. We collect these data to fulfil our pre-contractual and contractual obligations within the meaning of Art. 6 para. 1 lit. b GDPR.

d) When you create a Layout

When using the Payment Gateway you can individualize your account by uploading your Logo. We collect this data to fulfil our pre-contractual and contractual obligations within the meaning of Art. 6 para. 1 lit. b GDPR.

2) Disclosure of personal data to third parties

We will only transfer your personal data to third parties if you have given us your explicit consent, if there is a legal obligation to do so, or if it is necessary for the enforcement of our rights.

In addition, we will disclose your personal information to third parties as far as it is necessary for the use of the website, the processing of your contact requests and the providing of any services you requested. The use of this data by third parties is strictly limited to the mentioned purposes.

A service provider to whom personal data collected on the website is forwarded, or who has or could have access to said data, is our website hosting company. The website is hosted on servers based in Switzerland and Ireland (operated by Microsoft Ireland Operations Limited, Ireland, Flow Swiss AG, Switzerland and Secustor, Germany). The data is shared for the purpose of providing and maintaining the functionalities of our website. For this processing we rely on our legitimate interests within the meaning of Art. 6 para. 1 lit. f GDPR.

3) Transmission of personal data abroad

We are entitled to transfer your data to third-party companies located abroad to the extent this is required in connection with the processing described in this Data Protection Policy. Any such third-party companies are obliged to respect the privacy of users to the same extent as the provider itself. If the level of data protection in a country does not correspond to the Swiss or European level, we will ensure, by means of a contract, that the protection of your personal data corresponds to that in Switzerland or the EU at all times.

4) When using the Payment Gateway

When using the cloud-based application on the Website as a registered user, you can enter various information, in particular names of your employees and invoice details of your customers.

As a registered user, you are responsible for this data processing. We are only data processor. You are therefore responsible for compliance with the applicable data protection laws,

when processing data in the application. In particular, you are obliged to inform third parties, whose personal data you process in the application, about the data processing.

5) Cookies

In many respects, cookies help to make the visit of our website easier, more pleasant and more useful. Cookies are information files stored automatically by your browser on the hard disk of your computer when you visit our website. Cookies neither damage the hard disk of your computer nor do they transmit your personal data to us.

Most Internet browsers accept cookies automatically. However, you can configure your browser in such a way that no cookies are stored on your computer or a notice always appears when you receive a new cookie. The following pages explain how to configure the processing of cookies for the most common browsers:

- [Microsoft Windows Internet Explorer](#)
- [Mozilla Firefox](#)
- [Google Chrome for Desktop](#)
- [Google Chrome for Mobile](#)
- [Apple Safari for Desktop](#)
- [Opera for Desktop](#)

In addition to your browser settings, you have the option of selecting or deselecting the analytical cookies in the cookie-banner. Our cookie-banner appears upon your visit on our website.

Please note that deactivating cookies may prevent you from using all the features of our website.

The legal basis for processing the data for the above purposes lies in our legitimate interest in ensuring the functionality and optimization of the website and/or service (Art. 6 para. 1 lit. f GDPR). When there is no legitimate interest as described in this data protection policy (e.g. with regards to merely analytical cookies), we base the processing of your personal data on your consent that you have given via cookie-banner (Art. 6 para 1 lit. a GDPR). You can object to the processing at any time. The possibility of opting out has been mentioned above.

6) Offline processing of customer data

We collect data about our customers. Customer data is collected offline. In particular, we collect the contact details of the contact persons of our customers. We collect the following data:

- company name,
- company address, postcode, town/city,
- contact (name of contact person and business telephone number, copy of passport),

- history of customer relationship (in particular KYC-information),
 - contract conditions,
 - Form K, Identification of the controlling person of operating legal entities and partnerships both not quoted on the stock exchange (Art. 6 Abs. 1 Anti Money Laundering Act, AMLA),
 - Form 1A, Business profile (Art. 6 Abs. 1 Anti-Money Laundering Act, AMLA),
 - Google inquiries,
 - commercial register extracts
- further information collected via public sources.

The customer data is either stored on paper or in digital form in our CRM system, which runs on our own server.

The data stored in the CRM system is generally used to manage the customer relationship, for the customer history, for billing of operational services, for altering customers in the event of technical problems or necessary technical adjustments, and in some cases also for inviting customers to technical occasions of events.

The legal basis for the processing of your data for these purposes lies in the fulfilment of a contract according to Art. 6 para. 1 lit. b GDPR.

7) Information, deletion, revocation, correction, limitation of processing and data transferability rights, right to complain to a supervisory authority

You can object to data processing at any time. You also have the following rights:

Information right: You have the right at any time to request access to your personal data stored by us. This gives you the opportunity to check which personal data we process about you and that we use it in accordance with applicable data protection regulations.

Correction right: You have the right to have inaccurate or incomplete personal data corrected and to be informed of the correction. We will inform the individual concerned of the adjustments made to any incorrect data, unless such notification is impossible or involves a disproportionate effort.

Deletion right: You have the right to require us to delete your personal data, as long as there is no legal basis that allows us to further process such data.

Right to limitation of processing: You have the right, under certain conditions, to request the processing of your personal data to be restricted.

Data transferability rights: Under certain circumstances you have the right to receive from us the personal data that you have provided to us, free of charge and in a readable format.

Right to complain: If you are resident of an EU or EEA member country, you have the right to lodge a complaint with a competent supervisory authority against the way in which your personal data is processed at any time.

Right of revocation: You can withdraw your consent to certain data processing at any time, with effect for the future

Right to object: You can object to certain data processing at any time.

8) Data retention

We only store personal data for as long as is necessary to carry out the above tracking services and further processing in the context of our legitimate interest. We keep contract data for longer, as this is required by legal storage obligations. Obligations to store data, which oblige us to store data, result from accounting regulations and tax regulations. According to these regulations, business communication, concluded contracts and accounting documents must be stored for up to 10 years. If we no longer need this data to perform the services for you, the data will be blocked. This means that the data may then only be used for accounting and tax purposes.

9) Data security

We take all the reasonable technical and organizational security measures that we deem appropriate in order to protect your stored data against manipulation, loss, or unauthorized third-party access. Our security measures are continually adapted to technological developments.

We also take internal data privacy very seriously. Our employees and the service providers are required to maintain secrecy and to comply with applicable data protection legislation. In addition, they are granted access to personal data only insofar as this is necessary for them to carry out their respective tasks or mandate.

10) Contact

If you have any questions on data protection on our website, would like more information or would like to arrange for your data to be deleted, please get in touch with us by sending an E-mail to dataprotection@bitcoinsuisse.com.

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