

September 18, 2023

Privacy Notice

Data protection and data security are important to Bitcoin Suisse AG, registered in the Commercial Register of the Canton of Zug under company number CHE-472.481.853 (BTCS; we). We process your personal data responsibly, in accordance with applicable Swiss and European Union laws and in accordance with this Privacy Notice.

1 Content of this Privacy Notice

In this Privacy Notice, we inform you about how we collect and process personal data when you visit our website at www.bitcoinsuisse.com (Website) or social media pages, contact us or use our services as a client or inquire about our services as a prospect.

2 Responsible for Data Processing

BTCS is responsible for the data processing described in this Privacy Notice.

If you have any questions or if you wish to exercise your data protection rights, please contact us at dataprotection@bitcoinsuisse.com or write to: Bitcoin Suisse AG, Data Protection Officer, Grafenauweg 12, 6300 Zug.

Our representative in the EU is: BATLINER WANGER BATLINER Rechtsanwälte AG, Am Schrägen Weg 2, Postfach 105, FL-9490 Vaduz. You can contact the representative at philipp.mittelberger@bwb.li.

3 Personal Data processed during Communication and Service Provision

We collect information you provide to us as follows:

- when you contact us;
- when you visit our Websites or use other digital offerings,
- when you register as a user and/or client on the Website, Online Platform;
- when you open an account with us;
- when you use our services, or
- when you apply for a job with us;

This includes general personal data, such as name and contact information, and, if applicable, information about your position or role with the organization on whose behalf you are contacting us. Depending on the services you request from us or we provide to you this may also include personal data pertaining to the business relationship with you, including, but not limited to, offers, requests, contracts, transactions and instructions, accounts, assets (this may include private keys, if applicable), ability to repay credits, creditworthiness and solvency, other risk classifications, risk profiles, transaction history, claims, or other persons involved in the business relationship.

We also process personal data that we receive from third parties. This includes personal data that we receive in correspondence or meetings with clients or business partners, e.g. your name and details of your activity as a team member of the client or business partner.

To the extent necessary to achieve the purposes described in this privacy statement, we also collect general personal data from publicly accessible registers, Websites, from authorities and regulators, from third party provider and platforms, such as credit rating agencies or compliance database providers, etc. (e.g. to verify your signature authorization or your identity) or by obtaining information from third parties (e.g. for reference purposes in the application process, if you consent to this).

We may receive and collect personal data from clients with respect to other persons involved in the client's relationship with us, such as representatives, signatories, proxies, asset managers, or beneficial owners.

Within your business relationship with BTCS, you may be required to provide to BTCS such personal data as reasonably needed to establish (e.g., know-your-customer) and perform the contractual relationship, or required by law or regulation or internal rules. Without such personal data we may not be able or allowed to enter into and perform the business relationship.

4 Provision and use of our Website, Online Platform

4.1 Use for Information

You can visit the Website and find out about our services without telling us who you are. As with any connection to a web server, the server on which we provide the Website automatically logs and stores certain technical data. This includes the IP address, the date and time of access and other information that your browser sends when you access a Website (e.g. browser name and version, operating system, preferred language).

4.2 Use of our Online Platform

We operate Bitcoin Suisse Online (Online Platform). When you register as a client on the Online Platform, we collect the information you provide to us. This includes general personal data such as name and contact details as well as personal information that you or other users enter, upload, generate, store and process when using the Online Platform. We use Google Authenticator and reCAPTCHA in order to make the registration process as save as possible and protect our Website.

4.3 Web Analytics

We use web analytics services (currently Google Analytics) to evaluate the use of the Website and obtain information for its optimization. The web analytics services we use collect and store usage data using cookies. Before they are transmitted to a server outside Switzerland/EU/EEA, the requesting IP addresses are shortened. We thus do not transmit any personal data to the provider of the web analytics services abroad.

4.4 Resources from External Websites

We include resources from external servers on our Website. These contain visible content (videos, images), communication functionalities (e.g., chat plugins), as well as technical resources.

The technical resources are used to improve the performance or security of our Website. When calling up these resources, the operator of the external servers learns your IP address and/or certain marginal data that are necessary for the use of the servers of the external operator.

4.5 Cookie Usage Note

We use cookies, tags, and similar technologies on the Website to provide you with the best possible user experience and to help us improve the Website. Cookies are text files that are downloaded to your computer or mobile device when you visit a website or use an app.

Some of the cookies we use are necessary to provide certain features of the Website. In addition, we use cookies to analyze the use of the Website and to obtain information to optimize the Website.

You can instruct your browser not to accept cookies or to prompt you each time before a cookie is set. You can also delete cookies on your device by using the appropriate function of your browser. In addition, you have the possibility to inform us of your preferences regarding the acceptance of cookies via the cookie preferences tool used on the Website.

5 Use of our Social Media Sites

On our company pages or through our presence on social media platforms, you will find information on current developments at BTCS and our range of services. The respective social media platforms collect and

analyze usage data such as the number of visitors and demographic information about the visitors of our company page.

We may receive reports based on this data. The reports only contain aggregated or otherwise sufficiently anonymized data. Only the providers of the respective social media platform can identify you on the basis of the usage data collected.

6 Use and Optimization of our Newsletter

When you sign up for our newsletter, we collect the information you provide to us. This includes general personal data such as first name, last name and email address. We use analytics services to measure and analyze the use of our newsletter. The analytics services collect and analyze usage data such as the number of people who have opened a newsletter or clicked on certain posts. We receive evaluations based on this. These allow us to optimize our newsletter and provide you with content that interests you.

You can let us know at any time that you would like to stop receiving our newsletter in the future. To do so, please use the unsubscribe link at the end of the newsletter.

7 For which Purposes we Process your Personal Data and on which Basis

We process your personal data primarily to inform you about our range of services and to provide, document and invoice our services in accordance with our contractual and legal obligations.

In addition, we process your personal data for the following purposes:

- Responding to your inquiries and communicating with you;
- Processing your registration;
- Processing to job applications;
- Provision of the Website, Online Platform and Mobile App;
- Analysis and optimization of the use of the Website, Online Platform, Mobile App, and services;
- Optimizing our posts on our social media company pages;
- Advertisement and marketing activities;
- processing registrations for events
- Information about new developments at BTCS and about new services (e.g., via our newsletter; although you may notify us at any time that you wish to opt out of receiving such information in the future); and
- Enforcement of legal claims.

We have a legitimate interest in processing your personal data in accordance with the aforementioned purposes. Some processing is also necessary so that we can fulfill our contractual obligations. Furthermore, we may process your personal data to comply with applicable laws and regulations or internal rules of BTCS, such as with respect to the prevention of anti-money laundering and terrorist financing, know-your-customer, prevention of tax evasion, risk management and supervision, for combating abusive conduct, for purposes of investigations or proceedings and for the response to inquiries of public authorities.

We may also base our processing of specific personal data on your consent, whereby you can revoke this consent at any time.

On these legal bases, we process your personal data if and to the extent that the applicable data protection law requires a legal basis or justification for the lawfulness of the data processing in general or specific processing activities.

8 How we Store and Protect your Personal Data

We store your personal data only to the extent and for as long as necessary to fulfill the purposes described in this Privacy Notice or to comply with legal and regulatory obligations.

You are aware that data written on a blockchain as part of our service provision (e.g. execution of trade orders) cannot be deleted by BTCS.

In the interest of the integrity and confidentiality of personal data, we take appropriate technical and organizational measures. In particular, we implement access controls, and procedures to regularly review, assess, and evaluate the effectiveness of the measures in accordance with our risk assessment.

9 With whom we Share your Personal Data

In order to achieve the purposes described in this Privacy Notice, it may be necessary for us to share your personal data with third parties. These are the following categories of recipients:

- Other group companies;
- External service providers;
- Other clients (if applicable);
- Suppliers and business partners (e.g., intermediaries, correspondents, custodian banks, clearing houses, any stakeholder or market counterparties, exchanges or any company in which You hold financial instruments through us); and
- Authorities, agencies, and courts (if applicable).

10 Place of Processing

We store and process your personal data primarily in Switzerland and the EU. However, we may also transfer your personal data to recipients in countries outside of Switzerland or the EU (worldwide). We transfer data to countries without adequate data protection on the basis of the revised European Commission's standard contractual clauses including the Swiss specifications as required by the Swiss data protection supervisory authority, other transfer mechanisms, or legal exceptions (e.g. necessity for contract performance).

11 Your rights in relation to your Personal Data

You have the following rights in relation to personal data concerning you:

- The right to obtain information about what personal data we store about you and how we process it;
- The right to receive or transfer a copy of your personal data in a common format;
- The right to have your personal data corrected;
- The right to have your personal data deleted; and
- The right to object to the processing of your personal data.

Please note that legal and regulatory requirements and exceptions apply to these rights. To the extent permitted by law, we may refuse your request to exercise these rights. You also have the right to file a complaint with the competent data protection supervisory authority. In BTCS's case the primary supervisory authority is the Federal Data Protection and Information Commissioner of Switzerland.

12 How we can change this Privacy Notice

We may change this Privacy Notice at any time, in particular if we change our data processing practices or if new legal obligations become applicable. The version provided at www.bitcoinsuisse.com/legal applies in each case.