

## **PRIVACY POLICY**

This document sets forth the Privacy Policy applicable to the web portal named:

"Bitcan.pl" as of 05.07.2019.

### **§1 Definitions**

Whenever this document refers to:

1. Administrator - it should be understood as the administrator of personal data within the meaning of Article 4(7) of the RODO, which is the owner of the service " BITCAN" - company BITCAN sp. z o. o., Swoboda 11 , 60- 389 Poznań, NIP: 6292495068 , REGON: 384619443, entered in the Register of Entrepreneurs kept by the District Court Poznań - Nowe Miasto in Poznań, VIII Economic Department of the National Court Register under the KRS number 0000808472 . Share capital PLN 10. 500, 00.
2. Service - it should be understood as the website named " Bitc an.pl", run by BITC AN s p. z o.o., Swoboda 11 , 60- 389 Poznań, available at [www.bitcan.pl](http://www.bitcan.pl).
3. User - should be understood as a natural person, legal person or organizational unit without legal personality, who has accepted the Regulations and uses the services of the Website.
4. Services - it should be understood as services provided by "Bitcan.pl" website electronically, consisting of enabling the User to buy or sell currency units in ir current available on the Website.
5. Personal Data - it should be understood as the Users' personal data, as defined in Article 4 point 1 of the RODO, provided in connection with the use of the Service's services.
6. Processing of personal data - it should be understood as any operations performed on personal data within the meaning of Article 4(2) of the RODO .
7. RODO - it should be understood as the Regulation of the European Parliament and of the Council ( EU) 2016/ 679 of April 27, 2016.  
on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and the repeal of Directive 95 /46/ EC ( OJ EU 2016 item . L119).
8. Law of March 1, 2018 on Prevention of Money Laundering and Financing of Terrorism - means the Law of March 1, 2018 on Prevention of Money Laundering and Financing of Terrorism ( Journal of Laws 2018 item 723) implementing Directive of the European Parliament and of the Council ( EU) 2015 /849 of May 20, 2015 on the prevention of the use of the financial system for money laundering or terrorist financing and repealing the Law of November 16, 2000 on Prevention of Money Laundering and Financing of Terrorism.
9. Terms and Conditions - means the Terms and Conditions of the service available at [www.bitcan.pl/regulam](http://www.bitcan.pl/regulam) in.

### **§2 General information**

1. The Service performs functions of obtaining information about Users and their behavior through:
  - a) w proving data in forms;
  - b) Identification and verification of the identity of Users under the terms of the Regulations;
  - c) storing cookies ("cookies") on end devices;

d) collecting web server logs and other information arising in connection with or as a result of the operation and use of the Service.

### **§3 Principles of collecting Users' Personal Data**

1. The Service collects information provided by the User.
2. In addition, the service can save information about the parameters of the connection ( time stamp, IP address, &c.).
3. Acquired data shall not be transferred to a third country, except at the request of entities entitled to receive them under applicable law, including competent judicial authorities within the limits of applicable law.
4. Acquired data are not shared with third parties , except in certain situations and:
  - a. The user will agree to this;
  - b. it will be necessary in order to provide the Services, in particular in technical terms, payment processing services or other entities with which the Administrator cooperates in the performance of the Service;
  - c. it will be necessary in order to fulfill obligations under applicable laws - including primarily the Law of March 1, 2018 on Anti-Money Laundering and Countering the Financing of Terrorism - and within the limits of these laws, in particular to judicial authorities. Data may also be transferred to attorneys and legal advisors cooperating with the Administrator.

### **§4 Scope of Personal Data and its processing**

1. Use of the Website requires the creation of a user account. In order to create a user account, the User is required to provide his/her email address, telephone number and create a password.
2. Bearing in mind the requirements of the Law of March 1, 2018 on the prevention of money laundering and terrorist financing, the Administrator, before establishing business relations and carrying out transactions, shall verify the identity of the User on the basis of an identity document and the personal data resulting from it. Detailed rules for conducting verification are set forth in § 4 of the Regulations.
3. The User shall bear full responsibility for correct and accurate completion of User data referred to in paragraph 2.
4. Personal data shall be processed in accordance with the provisions of Regulation (EU) 2016 / 679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/ 46/EC (OJ . EU 2016 item L 119 ) and the Act of 10 May 2018 on the protection of personal data.
5. The basis for data processing is the User's consent or legal regulations authorizing the processing of personal data, including, in particular, the Act of March 1, 2018 on the prevention of money laundering and terrorist financing.
6. Provision of data by the User is voluntary, but nevertheless necessary to provide the Services.
7. Personal Data will not be shared with other entities without the knowledge of the User, with the exception of entities authorized by law.

8. Pursuant to Article 34(4) of the Law on Prevention of Money Laundering and Financing of Terrorism of March 1, 2018, the Administrator has the right to make copies of documents confirming the identity of Users and, to the extent that he is obliged to store Users' data, he exercises this right.
9. Properly secured copies of documents and information obtained for the purposes listed in paragraph 1 . and 2 . will be retained until the expiration of obligations under applicable laws.

## **§5 User Rights**

1. The User has the right to access (inspect) the content of the Personal Data and to correct it.
2. The User is entitled to request completion, updating, rectification of Personal Data, temporary or permanent suspension of its processing or deletion if it is incomplete, outdated, untrue or has been collected in violation of the law or is no longer necessary for the purpose for which it was collected.
3. The Administrator may refuse to delete Personal Data, in a justified case, if it is required by law - including, above all, the Law of March 1, 2018 on the prevention of money laundering and terrorist financing - or the information is the subject of a pending investigation or is necessary to clarify the circumstances of the User's violation of the Regulations, to the extent necessary to fulfill these obligations:
4. If you have any doubts about the processing of your Personal Data, you may obtain clarification from the Administrator and have the right to file a question, objection or complaint with the supervisory authority.
5. The basis for data processing is, in particular, the applicable regulations and laws, as well as consent, if given by the User.
6. Users' Personal Data will not be processed in an automated manner, including profiling.
7. Contact the Data Controller: kontakt@bitcan.pl.

## **§6 Information about cookies**

1. The website uses cookies.
2. Files and cookies ("cookies") are computer data, in particular text files, which are stored on the User's terminal equipment and are intended for use on the Website. Cookies usually contain the name of the website they come from, the time they are stored on the end device and a unique number.
3. The entity placing on the User's end device files and cookies and accessing them is the Administrator.
4. The cookies file is used for the following purposes:
  - a. creation of statistics that help to understand how Users use websites, which allows to improve their structure and content;
  - b. maintaining the User's session ( after logging in), thanks to which the User does not have to re-enter his/her login and password on each sub-page of the Website;

- c. Determining the profile of the User in order to display customized material to him/her on advertising networks, in particular the Google network.
5. The Service uses two main types of cookies: "session" (session cookies) and "permanent" (persistent cookies). "Session" cookies are temporary files that are stored on the User's terminal device until the User logs out, leaves the website or shuts down the software (web browser). "Permanent" cookies are stored on the User's end device for the time specified in the parameters of the cookies or until they are deleted by the User.
6. Web browsing software (Internet browser) usually allows the storage of cookies on the User's terminal device by default. Users can change their settings in this regard. The web browser allows the removal of cookies. It is also possible to automatically block cookies. For details, please refer to the help or documentation of your web browser.
7. Restrictions on the use of cookies may affect some of the functionality available on the Website.
8. The file and cookies may be used by advertising networks and networks, in particular the Google network, to display advertisements tailored to the way the User uses the Website. For this purpose, they may retain information about the User's navigation path or the time he or she stayed on a particular page.
9. With regard to the information about User preferences collected by the Google advertising network, the User can view and edit the information resulting from cookies using a tool:  
<https://www.google.com/ads/preferences/>.

## **§7 Server Logs**

1. Information about certain activities of Users is subject to logging in the server layer. This data is used for the administration of the service and to ensure the most efficient operation of the provided hosting services, as well as for evidentiary purposes in connection with the commission of permanent crimes or for circumstances related to the pursuit of civil claims.
2. The viewed resources are identified by URLs. In addition, the record may be subject to:
  - a) time of arrival of the query,
  - b) time to send a response,
  - c) The name of the User's station - identification implemented by HTTP, HTTPS protocol,
  - d) information about the errors that occurred during the execution of HTTP, HTTPS transactions,
  - e) URL address of a page previously visited by the User (referrer link) - in case the access to the Website was through a link,
  - f) User's browser information,
  - g) IP address information.
3. Some of the above data are not associated with specific Users using the Service.  
  
The Administrator does not link this data with the User's Personal Data and does not use it to identify the User, as it is used only for the purpose of server administration.

## **§8 Managing cookies**

1. If the User does not want to receive cookies , he/she can change his/her browser settings. We stipulate that disabling cookies necessary for authentication processes, security, maintenance of User preferences may hinder, and in extreme cases may make it impossible to use the Website.
2. Information on managing the cookie settings of a particular browser can be found on the website of its publisher.

## **§9 Contact**

You may contact the Administrator for information at: [kontakt@bitcan.pl](mailto:kontakt@bitcan.pl).