

## **PRIVACY POLICY**

Last Updated: February 2025

CoinPayments Inc., a Cayman Islands exempted company and PaidInSatoshi Inc., (“PaidInSatoshi”), a company incorporated and existing under the laws of the Republic of Panama, their respective direct and indirect subsidiaries and affiliates and any entities under common control with CoinPayments Inc. or PaidInSatoshi (collectively, “CoinPayments”, “we”, “us” and “our”) take data protection and security seriously. This Privacy Policy describes how we collect and process your personal data when you access content we own or operate on our website (the “Website”) or on any other websites, including, without limitation, the technology and the platform integrated therein, pages, features, content or applications we own or operate (collectively, the “Other Sites” together with the “Website”, the “CoinPayments Site”) and/or when you use any of our APIs or third party applications relying on such APIs, and any of our respective products or services (referred to collectively hereinafter as our “Services”). This Privacy Policy is incorporated by reference and forms part of our [User Agreement](#).

Please read this Privacy Policy carefully and its entirety. If you have any questions about this Privacy Policy, please contact us at [privacy@coinpayments.net](mailto:privacy@coinpayments.net).

### **ACCEPTANCE OF PRIVACY POLICY**

By accessing and using the CoinPayments Site or our Services, you acknowledge that you have read, understand, and agree to all of the terms and conditions contained in this Privacy Policy. If you do not agree with or are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue access or use of the CoinPayments Site and our Services.

### **CHANGES TO THIS PRIVACY POLICY**

We reserve the right to alter, amend or modify this Privacy Policy from time to time, in our sole discretion. We will provide you with notice of such changes by sending you an email, providing notice on the homepage of the Website and/or by posting the amended Privacy Policy on the Website and updating the “Last Updated” date at the top of the Privacy Policy. The amended Privacy Policy will be deemed effective immediately upon posting on the Website. Your continued use of the CoinPayments Site and/or our Services constitutes your agreement to be bound by any such changes to this Privacy Policy. If you do not agree with this Privacy Policy or any amendment to it, you should discontinue access and use of the CoinPayments Site and our Services.

### **DATA WE COLLECT**

We obtain information about you in a number of ways through your use of our products and Services, the CoinPayments Site, the account opening process, when you subscribe for events, news and updates or from information provided in the course of on-going support service communications including: (a) personal data that you voluntarily disclose or that is collected on an individual basis; (b) information collected automatically when you use the CoinPayments Site or our Services; and (c) information we receive about you from other sources (collectively, the “Information”).

We will only collect and process Information for specified and lawful purposes and only to the extent it is appropriate and necessary for one or more of the purposes outlined in this Privacy Policy, namely for the purpose of providing and improving our Services, to protect the security and integrity of our platform and/or to comply with our legal and regulatory obligations. You may be asked to provide personal data anytime you are in contact with us. Any information you provide to us that is not required is voluntary. You are free to choose whether to provide us with the types of personal data requested, but we may not be able to serve you as effectively or offer you all our Services if you choose not to share certain information with us.

## **Personal Data**

Personal data is any information which is related to an identified or identifiable natural person. This Privacy Policy covers all personal data that you voluntarily submit to us and that we obtain from our partners and service providers. This Privacy Policy does not apply to anonymized data, as it cannot be used to identify you. Personal data means any information that is unique to you such as the following personal information and documentation we, our partners or service providers may collect from you:

- full legal name, user ID, date of birth, birth place, age, nationality, citizenship, gender, signature, contact details (e.g. phone number and email address, etc.) and residential address;
- supplemental identification information such as government-issued identity documents (e.g. passport, driver's license, or state identification card, etc.), selfies, photographs and/or videos, social security number, employment information (e.g. company name), proof of residency, including utility bills and visa information;
- biometric data for verification and identification purposes;
- entity and institutional information if you are an entity or institution such as entity government number, formation documents, "know your business" information, and personal identification information for all material beneficial owners of your business;
- bank account information, payment card primary account number, credit card details, details about your source of funds, tax identification number, information about your income, assets and liabilities, and information relating to economic and trade sanctions lists;
- wallet information such as wallet addresses, self-custody, or multi-coin crypto wallet information, and information related to wallet integrations that you select;
- transactional information made using our Services such as trading account balances, custodial wallet activity, trading activity including the name of the sender, the name of the recipient, the amount, virtual asset preferences, payment method, date, and/or timestamp, settings and preferences you select, your inquiries and our responses;
- communication and referral information (including emails, text messages, correspondence sent through the "contact" section of the CoinPayments Site and call recordings) or information obtained from events or public social networking platforms

and your contacts' phone or email addresses if you choose to refer people to us, along with our responses to you;

- other personal data or commercial and/or identification information including Information we, in our sole discretion, deem necessary to comply with our legal obligations, such as anti-money laundering laws; and
- other personal data or commercial and/or identification information you choose to provide us.

With your permission, we may also access other personal data on your device, such as your phone book, calendar, or messages, in order to provide Services to you. If authorized by you, we may also access profile and other information from services like Facebook.

By using our Services or providing us with your personal data, you expressly consent for us to collect, hold, use and disclose your personal data in accordance with this Privacy Policy and our [User Agreement](#).

You are required to advise us of any changes in your personal data that may impact the Services we are providing. From time to time, you may be asked to verify or update your personal data.

#### **Information that is Collected Automatically**

- **Browser and Server Log Information:** We collect browser and server log information when you use the CoinPayments Site, which may include (but is not limited to) your login details, the date and time of visits, the pages viewed, your IP address, time spent at the CoinPayments Site, the websites you visit just before and just after the Website, browser type and version, your time zone setting and browser plug-in types and versions.
- **App and Device Information:** We collect information about the computer or mobile device you use to access the CoinPayments Site, including the hardware model, geo location/tracking details, browser fingerprint, operating system and version and other device characteristics and identifiers.
- **Telemetry Information.** If you use any of our open-source software, we may collect bandwidth download and upload speeds, the amount of free and used storage space on your device and other statistics about your device.
- **Usage Information.** If you use the CoinPayments Site, we will collect metadata about how our Services are performing when you use them, the files you upload for storage and information about the transactions you make on the CoinPayments Site or with our Services, such as the name of recipients, your name, digital asset amounts, click-stream data, instances in which you have used your private key to authenticate communications and/or the timestamp of transactions.
- **Information Collected by Cookies and Other Tracking Technologies:** We and our service providers use various technologies to collect information when you interact with the CoinPayments Site, including cookies, web beacons and other unique device identifiers. Cookies are small data files that are stored on your device when you visit a

website, which enable us to collect information about your device, IP address, web browsers used to access the CoinPayments Site, pages or features viewed, time spent on pages, mobile app performance and links clicked. Web beacons are graphic images that are placed on a website or in an email that is used to monitor the behaviour of the user visiting the website or sending the email. They are often used in combination with cookies.

## **Information we obtain from Affiliates, Partners and Third Parties**

Information we obtain from our affiliates, partners and third parties include the following:

- Information from our service providers including those who assist us with ID verification, AML, fraud, and security compliance including information confirming your identity, fraud, security, sanctions, AML and other risks and other relevant data;
- Information about you from publicly available sources including public databases, government records and sanctions lists;
- Information from our affiliates, business and marketing partners, other third parties and social media platforms such as your user name, account information and what other services and products you use;
- Information from third parties like virtual asset exchanges or banks that you use to transfer virtual assets or money to us or our business partners, including your name, address and account details;
- anonymized or de-identified information about you, such as how you found our website from advertising, marketing, analytics providers and search information providers;
- personal data during the credit referencing process including your employment and credit history from credit reference agencies; and
- public blockchain data, including timestamps of transactions or events, transaction IDs, digital signatures, transaction amounts, and wallet addresses.

## **HOW YOUR PERSONAL DATA IS USED**

The primary purpose for collecting your Information is to provide you with the best possible user experience and Services and to safeguard the security and stability of our systems. In general, we use Information to create, develop, operate, deliver, and improve our Services, content, and marketing, to comply with our legal obligations, for anti-fraud purposes and for loss prevention.

For each of the purposes set forth below for which we process Information, we rely on any one or more of the following legal justifications:

- (a) **Contractual Necessity** – we rely on this justification where we process your personal data in order to discharge contractual obligations we owe you for purpose of service delivery.
- (b) **Legitimate Business Interest** – we rely on this justification where we need to process your personal data in order to meet our own requirement to operate, manage, and develop our business or to safeguard the legitimate interests pursued by us or by a third party (provided there is a balance between your interests and our interests). A legitimate interest is when we have a business or commercial reason to use your information.
- (c) **Legal Obligation** – we rely on this justification where we use your Information for the purpose of legal and regulatory compliance. We do this not only to comply with our legal obligations but because it may also be in our legitimate interest to do so.

- (d) **Legal Proceedings** – we rely on this justification where it is necessary to handle your Information for the purpose of obtaining legal advice; in connection with any legal proceeding; or to exercise or defend legal rights in accordance with applicable data protection legislation.
- (e) **Consent** – we use your Information based on your consent.
- (f) **Public Interest** – processing your Information is necessary for the performance of a task carried out in the public interest.

Specifically, we will process your Information on the following legal bases for the following purposes:

- to create and maintain your account with us, to provide, maintain, deliver or improve our products and Services and the CoinPayments Site and to enable the completion of the client on-boarding process – our legal justification for processing your personal data for this purpose is **Contractual Necessity**;
- to administer our products and Services, to provide you with information in respect of our products and Services and review your ongoing needs, to troubleshoot our products and Services, to improve our products and Services including quality control and staff training and to develop new products and Services to ensure we can provide you with the best user experience and accurate information – our legal justifications for processing your personal data for this purpose are **Contractual Necessity and Legitimate Business Interest**;
- to manage, maintain and develop our relationship with you and provide you with customer support and service including, without limitation, communicating with you, answering your inquiries or responding to a communication from you and sending you technical notices, support or administrative notifications – our legal justifications for processing your personal data for this purpose are **Contractual Necessity and Legitimate Business Interest**;
- to personalize our products and Services, and your experience on the CoinPayments Site, including tailoring the content and recommendations we provide to you and to monitor and analyze trends, usage and activities in connection with the CoinPayments Site, to determine the usefulness or popularity of certain content and to better understand the online activity of users of the CoinPayments Site – our legal justification for processing your personal data for this purpose is **Legitimate Business Interest**;
- for research and development purposes including developing new products or services, to conduct surveys and data analysis and to market our products and services and to link, connect or combine Information we collect from or about you with other Information – our legal justifications for processing your personal data for this purpose are **Legitimate Business Interest and Consent** where you have agreed to participate in surveys, have requested information on products or services or agreed to receive marketing messages directly;
- to update and verify your personal data in accordance with relevant applicable law including anti-money laundering compliance frameworks and to notify you of changes to our products or Services and/or to laws and regulatory rules and regulations – our legal

justifications for processing your personal data for this purpose are **Legal Obligation and Legitimate Business Interest**;

- to engage, utilize or for you or us to receive services from business partners or third parties including without limitation wallet services, virtual asset conversion services including virtual asset to virtual asset and virtual asset to fiat conversion services, administrative, legal, tax, compliance, insurance, IT, debt-recovery, analytics, credit reference, identity verification, research or other services – our legal justification for processing your personal data for this purpose is **Legitimate Business Interest**;
- to pay our partners and third party service providers and to receive payments from them – our legal justification for processing your personal data for this purpose is **Legitimate Business Interest**;
- to ensure our compliance with all relevant legal or regulatory requirements and to meet our regulatory and legal obligations including conducting or arranging for the conducting of credit or identity checks and for the purposes of identity verification, compliance with court orders, tax laws or other reporting obligations and anti-money laundering controls – our legal justifications for processing your personal data for this purpose are **Legal Obligation and Legal Proceedings**;
- to promote the safety, security and integrity of our Services including verifying accounts and related activity, to enforce the terms and conditions of our [User Agreement](#) and other agreements we may have with you or third parties including, without limitation, if we believe your actions are inconsistent with our [User Agreement](#), our other agreements or policies, to find and address violations of our [User Agreement](#) or policies, to investigate suspicious activity, detect, prevent and combat harmful or unlawful behavior, detect fraudulent behavior and to maintain the integrity of our Services – our legal justifications for processing your personal data for this purpose are **Contractual Necessity, Legal Obligation and Legitimate Business Interest**;
- to assess risks including legal and financial risks, it is necessary for us to perform a task in the public interest, or it is necessary for, or to protect, our interests, rights, property and safety, or that of others – our legal justifications for processing your personal data for this purpose are **Legitimate Business Interest, Legal Obligation and Public Interest**;
- to comply with applicable laws, subpoenas, court orders, other judicial process, or the requirements of any applicable regulatory authorities – our legal justifications for processing your personal data for this purpose are **Legal Obligation and Legitimate Business Interest**;
- to enforce and defend our rights including initiating legal claims, preparing our defense in litigation procedures, addressing legal or administrative proceedings whether before a court or a statutory body and to investigate or settle issues, enquiries and/or disputes – our legal justification for processing your personal data for this purpose is **Legitimate Business Interest and Legal Proceedings**;
- for internal business purposes and recordkeeping, to invoice and process payments, to monitor and manage the performance of our business operations and to analyze

performance and generate internal reports – our legal justifications for processing your personal data for this purpose are **Legitimate Business Interest and Legal Obligation**;

- to devise and facilitate the effective management, administration and strategy of our business, including in relation to matters such as business planning, budgeting, and forecasting and the pricing of our products and Services – our legal justification for processing your personal data for this purpose is **Legitimate Business Interest**;
- to administer our business effectively such as through means and processes we undertake to provide for our IT and system security, preventing potential crime and to ensure asset security and access controls – our legal justification for processing your personal data for this purpose is **Legitimate Business Interest**;
- to ensure network and information security including processing your Information in order to enhance security, monitor and verify identity or service access, combat spam or other malware or security risks and to comply with applicable security laws and regulations – our legal justifications for processing your personal data for this purpose are **Legal Obligation and Legitimate Business Interest**;
- in order to detect, investigate and prevent fraud or other illegal or unauthorized transactions or activities – our legal justifications for processing your personal data for this purpose are **Legal Obligation and Legitimate Business Interest**;
- to facilitate a reorganization, an asset or business sale, corporate acquisition, merger, or other transactions – our legal justification for processing your personal data for this purpose is **Legitimate Business Interest**; and
- to carry out any other purpose or reason for which the Information was collected, for which we have received your consent or for which we or our partners or third parties have a legitimate interest – our legal justifications for processing your personal data for this purpose are **Consent and Legitimate Business Interest**.

## **SHARING OF INFORMATION**

We will never sell or rent your personal data. We will only share your Information if and to the extent appropriate or necessary to do so for one or more of the purposes outlined in this Privacy Policy or our [User Agreement](#) and will ensure that the sharing of such Information is kept to the minimum necessary. To the extent we share your Information will vary depending on your circumstances and your relationship with us, but we may share your Information with one or more of the following categories of recipients:

- other members or associates of your organization;
- our current or future parent companies, affiliates, subsidiaries and with other companies under common control or ownership with us or our offices internationally;



- advisors, contractors, consultants, agents, service providers, business partners and other third parties (who may store your personal data within their own systems) that we have partnered with or perform work for us including those who support our business operations, those who provide ancillary services which complement the Services we provide, and specialist advisors who have been contracted to provide us with administrative, financial, legal, tax, compliance, insurance, IT, debt-recovery, analytics, research or other services;
- users of interactive areas of the CoinPayments Site or our social media platforms like our online forums if you choose to share or display your personal data on them publicly, such as your username and any content you post;
- third parties, advisors, agents and other service providers in connection with a reorganization, change of ownership, merger or transfer of all or part of our assets or business, or if we do a financing or are involved in an acquisition or any other situation where Information may be disclosed or transferred as one of our business assets;
- government departments and agencies, law enforcement officials, regulators, courts, tribunals or other third parties when we are compelled to do so by a subpoena, court order, or similar legal procedure or request, or when we believe in good faith that the disclosure of Information is necessary to prevent physical harm or financial loss, to report suspected illegal activity, to investigate violations of this Privacy Policy, our [User Agreement](#) or any other applicable policies or if we believe disclosure is in accordance with, or required by, any applicable law, regulation or legal process; and
- third parties where aggregate Information is disclosed which cannot be reasonably be used to identify you.

We use reasonable efforts to ensure that third parties we partner with are bound by the terms of this Privacy Policy or a similar policy. Your Information may be transferred to or accessed by the recipients described above from countries located anywhere in the world. Such countries may have different and potentially less stringent standards relating to data protection than your country. In these cases, we will, whenever possible, take all appropriate steps that are within our control to ensure that adequate legal safeguards are in place for your personal data which are shared with such recipients. Courts, law enforcement and security agencies of these jurisdictions may be able to use legal processes to access your personal data.

By using our Services, you consent to your Information being transferred to other countries, including countries that have differing levels of privacy and data protection laws than your country. In all such transfers, we may rely on standard contractual clauses and will protect and process your personal data as described in this Privacy Policy.

## **SOCIAL SHARING FEATURES**

The CoinPayments Site may offer social sharing features, links to social media and other integrated tools. Your use of such features enables the sharing of information with your contacts or the public, depending on the settings you use with the entity that provides the social sharing feature or social media. Please visit the privacy policies of the entities that provide these



features to obtain more information about the purpose and scope of data collection and the processing of such data by such entities.

## **HYPERLINKS AND THIRD-PARTY SITES**

The CoinPayments Site may contain links to other third-party websites that may collect personal data about you, including through cookies or other technologies. If you link to another website, you will leave the CoinPayments Site and this Privacy Policy will not apply to your use of and activity on those other websites. You should consult these other websites' privacy policies as we have no control over them and are not responsible for any information that is submitted to or collected by these third parties.

## **PRIVACY WHEN USING DIGITAL ASSETS AND BLOCKCHAINS**

Your transactions involving bitcoin, ether and other digital currency or virtual assets may be recorded on a public blockchain. Public blockchains are distributed ledgers, intended to immutably record transactions across wide networks of computer systems. Many blockchains are open to forensic analysis which can lead to deanonymization and the unintentional revelation of private financial information, especially when blockchain data is combined with other data.

Because blockchains are decentralized or third-party networks which are not controlled or operated by us, we are not able to erase, modify, or alter personal data from such networks.

## **MARKETING AND ONLINE COMMUNICATION**

We require your consent to send you marketing communications (for example: email marketing, exclusive offers, etc).

If you are a *new* customer, we will contact you by electronic means (email or SMS) for marketing purposes only if you have consented to such communication. If you are a *current* customer, we will only contact you by electronic means with information about our Services that are similar to those which were the subject of a previous sale or negotiations of a sale to you.

If you do not want us to use your personal data for direct marketing purposes or to pass your personal data on to third parties for marketing purposes, you can withdraw your consent by contacting us at [privacy@coinpayments.net](mailto:privacy@coinpayments.net). Direct marketing includes any communications to you that are only based on advertising or promoting products and services.

As mentioned above, you can opt out of our marketing communications anytime. However, certain electronic communications between us and you are necessary for usage of our Services including login notifications, withdrawal confirmations, deposit notifications and 2-Factor Authentication (this can be replaced with Google Authenticator, Authy, or Trezor). We highly recommend that you do not turn off 2-Factor Authentication as this provides the maximum amount of security for your account.

If you chose not to consent to the terms of this Privacy Policy or opt out of receiving notifications from us that makes it difficult or impractical for us to provide Services to you, we will grant you a period of up to 10 business days from the moment you do not consent or opt out to move your assets to an external digital wallet of your choosing and close your account.

## **PROTECTION OF PERSONAL DATA**

We take reasonable administrative, physical and electronic measures designed to safeguard and protect your personal data from unauthorized access or disclosure. This includes utilizing Secure Sockets Layer (SSL) software, which encrypts the personal data you input, and storing your personal data in encrypted form behind a firewall designed to block access from outside our network. However, no security or encryption method can be guaranteed to protect information from hackers or human error, no computer security system is entirely fool-proof, and the Internet is not a secure method of transmitting information. As a result, we do not assume any responsibility for the data you submit to or receive from us through the Internet or for any unauthorized access or use of that information and we cannot and do not guarantee that personal data communicated by you to us or sent to you by us will be received or that it will not be altered before or after its transmission to us.

We cannot guarantee that loss, misuse, unauthorized acquisition, or alteration of your Information will not occur. Please recognize that you play a vital role in protecting your own Information. When providing information on the CoinPayments Site or accessing or using our Services, you should choose a password of sufficient length and complexity, not reveal this password to third parties, and to immediately notify us if you become aware of any unauthorized access to or use of your account.

Furthermore, we cannot ensure or warrant the security or confidentiality of Information you transmit to us or receive from us by Internet or wireless connection, including email, phone, or SMS, since we have no way of protecting that Information once it leaves and until it reaches us. If you have reason to believe that your data is no longer secure, please contact us at [privacy@coinpayments.net](mailto:privacy@coinpayments.net).

## **RETENTION PERIOD OF DATA**

Information we collect may be stored or processed on computers located in any country where we or our partners provide Services or carry on business. We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting obligations or to resolve disputes. This is a case-by-case determination that depends on things such as the nature of the data, why it is collected and processed, and relevant legal or operational retention needs. For example, we may retain certain information for accounting and security purposes even after our business relationship with you has ceased. We may need to maintain records for a significant period of time after you cease being our client for legal or regulatory reasons, for example, when we need to retain information to help manage a dispute or legal claim. Additionally, we are subject to certain anti-money laundering laws which may require us to retain your personal data for a period after our business relationship with you has ended.

## **RIGHTS YOU HAVE WITH RESPECT TO YOUR PERSONAL DATA**

You have certain individual rights regarding the personal data that we collect and process about you through the CoinPayments Site.

Most web browsers are set to accept cookies as a default. You may wish to opt out by turning off cookies (please refer to the help menu on your browser); however, switching off cookies may restrict your use of the CoinPayments Site.

As mentioned, you may also opt out of receiving promotional communications from us at any time by following the instructions in those communications. If you opt out, we may still send you non-promotional communications, such as technical notices, support or administrative notifications or information about your account (if you have one).

Pursuant to applicable data protection laws, you may have certain legal rights in respect of the personal data which is processed by us including the right to:

- access or receive certain data about the personal data we process about you;
- have your personal data corrected, updated, rectified or deleted;
- object to the processing of your personal information or ask us to restrict processing of your personal data;
- withdraw your consent to our processing of your personal data; and
- not be subject to a decision based solely on automated processing of your personal data, including profiling, which produces legal or similarly significant effects on you, save for the exceptions applicable under relevant data protection laws.

If applicable data protection laws apply, you may also have the right to receive a copy of your personal data in a structured, commonly used and machine-readable format for the purpose of transferring such information to a third party subject to a reasonable fee associated with the work required by us to gather the information.

Please note, however, that your rights are subject to certain exceptions and conditions. Specifically, we may need to further process and retain your Information to perform a contract with you or your company or organization, to protect our legitimate interests (such as the establishment, exercise or defense of legal claims) or to comply with legal requirements. To the extent permitted by law, namely, to protect the rights and freedoms of others or to protect our own legitimate interests, we may therefore refuse to satisfy your request or we may satisfy your request only on a restricted basis.

You may withdraw your consent to the processing of your Information. However, if there is another legitimate basis for processing your Information, the Information may be processed without your consent.

Lastly, you have a right to lodge a complaint with a competent supervisory authority.

If you wish to exercise any of your rights, you should contact us at [privacy@coinpayments.net](mailto:privacy@coinpayments.net).

## **CHILDREN'S PERSONAL DATA**

We do not knowingly collect personal data from any person under the age of 18. If a user submitting personal data is suspected of being younger than 18 years of age, we will require the user to close his or her account and will not allow the user to continue to use our Services. We will also take steps to delete the Information as soon as possible. Please notify us if you or anyone you know is under the age of 18 and are using our Services so we can take action to prevent access to our Services.

## **HOW TO CONTACT US**

If you have questions or concerns regarding this Privacy Policy or if you have a complaint, please contact us at [privacy@coinpayments.net](mailto:privacy@coinpayments.net). If we are unable to satisfactorily address your concerns, you have the right to communicate with a relevant supervisory authority. We can direct you to the relevant supervisory authority in your jurisdiction.