

BITORBIT

Privacy Notice

Last Updated: August 24, 2022

The Bitorbit website available at <https://bitorbit.com>, including any of its subdomains (the “**Website**”) is provided by Multichain Labs LTD (“**we**”, “**our**”, “**us**” or “**Bitorbit**”). With respect to personal data collected on the Website, we act as a data controller, meaning that we determine the purposes and means of processing your personal data.

In this Privacy Notice we explain how we collect and process your personal data. Personal data or personal information means any information directly or indirectly identifies you as an individual. In this Privacy Notice we use “personal data” and “personal information” as synonyms.

This Privacy Notice also governs the processing of personal data in the Telegram groups, channels, and/or chats administered by us, such as https://t.me/Bitorbit_community (the “**Telegram Bitorbit Channels**”). You may see the official Telegram Bitorbit Channels on the Website.

We process personal data in accordance with this Privacy Notice and we endeavour to comply with the applicable data protection legislation. If you have any questions regarding processing of your personal data, do not hesitate to contact us via the contact details provided below.

Contact details

Name: Multichain Labs LTD, a British Virgin Islands business company

Address: Intershore Chambers, Road Town, Tortola, P.O. Box 4342, the British Virgin Islands

Email: legal@bitorbit.com

What information we collect

The categories of personal data we collect depend on how you interact with us, the Website, and the requirements of applicable data protection legislation:

A. Application Data

In order to get “whitelisted” to use the test version of the Bitorbit application (the “**App**”), i.e., to get early access to the App, we collect the following personal data:

- i) email address;
- ii) Twitter account username (e.g., @username);
- iii) information about social media accounts, which includes Discord and Telegram usernames; and
- iv) Apple ID to access the App, if any.

B. Social Media Data

When you access or otherwise participate in the Telegram Bitorbit Channels, you may provide certain personal data to us and/or Telegram, the operator of which is Telegram Messenger Inc. (the “**Telegram**”). Such personal data may include nicknames, names, photos, messages, comments, communications, and other data that you choose to provide us with.

According to the applicable data protection legislation, we may be considered a data controller or joint controller of such data.

C. Analytical Data

When you access and use the Website, certain data may be collected automatically via Matomo service provider (“**Matomo**”). More information regarding Matomo is available at <https://matomo.org>.

Matomo provides us with the analytics regarding how many users visited the Website, how long they stayed on the Website, etc. Matomo provides anonymised and aggregated information, so we are not able to identify you as a particular individual from the other users of the Website. Matomo collects the following information:

Data:	Description:
Visit Duration	This includes information about the amount of time spent on the Website.
Location	This allows us to see from which continent and country you access the Website. Unlike IP addresses, we cannot identify your precise location.
Actions	This includes information about the page views, downloads, outlinks, internal Website searches.
Browser details	This includes information about the browser type, plugins and language.
Device details	This includes information about the type of the device (e.g., computer, tablet, or smartphone), device model, brand, and screen resolution.
Operating system	This means the information about the type and version of the operating system on your device.
Visitor IP	This includes information about the date and time of your visit to the Website and actions.
Visit Source	This means information about the source from which you access the Website, e.g. the direct entry, social media, or other websites.
Page Load Time	This means information about the average load time for pages

D. Contact Data

We may also collect certain data if you reach us via (a) the contact details indicated in this Privacy Notice or on the Website, or (b) support system that is available on the Website. In this case, we may collect and process certain information related to your request, such as email address, name, or any

other data requested by us or data that you choose to provide us with. If you make a request via the support system available on the Website, the system will also automatically collect your country and the last time you logged in the support system.

How we use and share the information

A. General

We do not sell or rent out your personal data. However, we may pass your information to our third-party service providers and subcontractors for the purposes of and if it is necessary to provide you with the access to the Website and its functionality. These service providers may include, for instance:

- (a) our affiliates, meaning any person controlling, controlled by, or under the same control as Bitorbit;
- (b) analytical solution providers, e.g. [Matomo](#);
- (c) marketing teams;
- (d) support teams;
- (e) customer service software, e.g. [Zoho Desk](#);
- (f) technical teams;
- (g) hosting service providers; and
- (h) other third-party solutions integrated in the Website, such as [Google](#) when you use the Google form in order to get whitelisted to use the App.

We may also disclose your personal data if we are under a duty to disclose or share such data in order to comply with a legal obligation. However, we will endeavour to take reasonable steps to ensure that your rights continue to be protected. In addition, your personal data will be transferred to the government authorities, upon their request or if necessary to comply with a legal obligation, or another entity if we sell or otherwise transfer the Website or its part.

B. Application Data

We collect the Application Data in order to enable you to get “whitelisted” and to access and use the App and its certain functionality and benefits. The legal basis for the processing is the necessity for the performance of a contract with you, i.e. to provide you access to the App upon your request. Some information, such as social media usernames are collected based on our legitimate interest to understand which social media are used by the App users.

C. Social Media Data

We process the data collected within the Telegram Bitorbit Channels for the following purposes:

- a. communicate with the visitors, participants, or subscribers;
- b. handle requests from visitors via the Telegram Bitorbit Channels;
- c. obtain statistical information about the reach of the Telegram Bitorbit Channels; and

- d. conducting customer surveys, marketing campaigns, market analyses, competitions or similar promotions or events.

As a general rule, the legal basis for the processing is our legitimate interest to achieve the above purposes. If and to the extent you wish to enter into a contractual relationship with us, the legal basis for such processing is the necessity to take steps at your request prior to entering into a contractual relationship and further to perform a contractual relationship between you and us. If we intend to process your personal data for a purpose other than those stated above, we will inform you of this prior to such processing.

Please note that Telegram collects and processes personal data to the extent described in its privacy policy, which can be found [here](#). We may receive certain anonymized statistical information from Telegram regarding the use of the Telegram Bitorbit Channels.

With respect to the above processing, we and Telegram are regarded as “joint controllers”, meaning that we jointly determine the purposes and means of processing your personal data. In addition to the processing of personal data stated in this Privacy Notice, we have no influence on the processing of personal data in connection with your use of the Telegram Bitorbit Channels, or Telegram as such.

D. Analytical Data:

Analytical Data helps us to provide a better user experience by improving the Website user flow and interface, and to understand the type of content you find useful.

In order to collect the Analytical Data, we will ask your consent. You may opt-out from collecting the Analytical Data within the Website and/or by blocking cookies and similar tracking technologies in your browser settings.

E. Contact Data:

The purpose for processing your personal data when you contact us is to respond to your inquiry and the legal basis is our legitimate interest to do the same.

You may also be able to create an account with the support system, for which purpose you will need to provide your name and email. If you create an account, you will be able to submit tickets, browse through articles and participate in the Bitorbit community. The legal basis for the processing is the necessity for the performance of a contract with you, i.e. to provide you access to the support functionality.

How long we process your data

A. General

As a general rule, we keep the data as long as it is necessary for the purposes it was collected. If necessary under the applicable law or to protect our rights and interest or those of third parties, we may process the data longer than outlined below.

B. Application Data

We process your Application Data as long as you remain a user of the App.

C. Social Media Data

If not expressly provided otherwise (e.g. in a specific consent form or privacy notice or statement), we will retain your personal data as soon as it is necessary for the purposes mentioned above in the

dedicated Social Media Data subsection of this Privacy Notice. We may retain your personal data longer, if it is necessary (1) according to our legal obligations (such as data retention periods provided for by commercial or tax law) or (2) to resolve disputes and lawsuits, exercise or defend legal claims or lawsuits.

D. Analytical Data

As long as the Analytical Data is anonymous, aggregated and does not allow us to identify any particular person, we do not establish any storage period. If and to the extent we become able to identify any particular person, we will promptly update this Privacy Notice and establish a certain limitation period for processing the Analytical Data.

E. Contact Data

We store the contact data for one (1) year from the last date when you contacted us regarding the same matter. We set this retention period during the statutes of limitations established in our [Legal Notice](#). In case of pending legal actions, we may process the Contact Data longer. The data related to your account with the support system will be processed until your account is terminated.

Third-party links

The Website may include links and social media plugins to third-party websites and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and applications, and are not responsible for their privacy statements. When you leave the Website, we encourage you to read the privacy policy/notice/statement of every website or application you visit.

Your rights

According to the applicable data protection legislation, you may have the following rights:

- request **access** to your personal data (commonly known as a “data subject access request”). This enables you to ask us whether we process your personal data and, if we do process your data, you may request certain information about the processing activity and/or a copy of the personal data we hold about you and to check that we are lawfully processing it;
- request **correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us;
- request **erasure** of your personal data (commonly known as the “right to be forgotten”). This enables you to ask us to delete or remove personal data where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal or technical reasons which will be notified to you, if applicable, at the time of your request;
- **object** to processing of your personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing

purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;

- request **restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (1) if you want us to establish the data's accuracy, (2) where our use of the data is unlawful but you do not want us to erase it, (3) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims, (4) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- request the **transfer** of your personal data to you or to a third party (commonly known as the "right to the data portability"). We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you;
- **withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent;
- not to be subject to a **decision based solely on automated processing of data**, including profiling, which produces legal effects concerning you or similarly significantly affecting you; and
- **file a complaint** with a relevant supervisory authority in case we violate your rights or obligations imposed on us under the applicable data protection legislation. The relevant supervisory authority may depend on where you are located.

In order to exercise your rights as a data subject, we may request certain information from you to verify your identity and confirm that you have the right to exercise such rights.

Children personal data

The Website is not intended for the use of children (under 18 years old or older, if the country of your residence determines a higher age restriction). We do not knowingly market to, or solicit data from children. We do not knowingly process, collect, or use personal data of children.

If we become aware that a child has provided us with personal information, we will use commercially reasonable efforts to delete such information from our database. If you are the parent or legal guardian of a child and believe that we have collected personal information from your child, please contact us.

Changes to this Privacy Notice

We keep our Privacy Notice under regular review and may update it at any time. If we make any changes to this document, we will change the "Last Updated" date above. Please review this Privacy Notice regularly.