

PRIVACY NOTICE

Updated 10.2.2025

With this privacy notice, we provide information on how and why Bittimaatti Oy processes personal data when offering services.

1) WHAT TERMS ARE USED IN THIS PRIVACY NOTICE?

Personal data means any information about the user of Bittimaatti or information that can be used to identify the user.

Processor means a person who processes personal data on behalf of the controller.

The processing purpose means the reason why the controller processes Bittimaatti user's personal data.

Legal basis means the legal basis on which the controller processes Bittimaatti user's personal data. The legal grounds are described in Article 6 of the Data Protection Regulation.

Profiling means the automatic processing of personal data, where personal data is used to evaluate Bittimaatti user's personal characteristics.

The Money Laundering Act means the law on the prevention of money laundering and terrorist financing applicable to us (444/2017).

Controller means the person who is responsible for the processing of Bittimaatti user's personal data.

Data protection notice means a document drawn up pursuant to Articles 13 and 14 of the EU General Data Protection Regulation, with which the data controller informs Bittimaatti users about the ways in which the data controller processes their personal data.

2) CONTROLLER CONTACT INFORMATION

The controller of your personal data is Bittimaatti Oy.

The handler of your personal data is SUMSUB TECH LTD, registered in Cyprus with identifier HE 424752, Agiou Andreou 153, 3036, Limassol, Cyprus.

If you have any questions regarding your personal data, you can contact the Data Protection Officer at the following email address: support@bittimaatti.fi.

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3) WHY DO WE PROCESS YOUR PERSONAL DATA?

We process our customers' personal data in the provision and development of our services, in communication, and in order to comply with the provisions of the Money Laundering Act.

Our legal basis for processing personal data depends on the purpose of the processing of personal data. We use the following legal bases for processing personal data: (i) the performance of contracts with our customers, (ii) legal obligations under the Money Laundering Act, (iii) for payment services, consent in accordance with the Payment Services Act (290/2010), and (iv) our legitimate interest in developing and communicating our services.

In our operations, we process the following personal data: name, basic and contact information, date of birth, information regarding the use of our services and information required by the Money Laundering Act. If the Bittimaatti user is also a registered user of the Coinmotion service, Coinmotion Oy acts as the data controller in relation to the Coinmotion service.

4) WHERE DO WE COLLECT YOUR PERSONAL DATA?

We collect personal data about you from you (including the terminal device and browser you use) when you use our services, as well as from our partners (e.g. service providers used to comply with the Money Laundering Act), authorities and public sources (e.g. the Trade Register).

5) WILL WE SHARE YOUR PERSONAL INFORMATION WITH OTHERS?

As a general rule, we *do not disclose your personal data* to third parties. However, if mandatory legislation or authorities require us to disclose your personal data, we will assess the legality of the disclosure on a case-by-case basis with the assistance of our Data Protection Officer.

We do not share, or in data protection terms, *transfer* your personal data to others as part of our normal business operations when using various digital services or services intended to comply with the Money Laundering Act. Transfers are carried out securely and under appropriate data protection agreements.

6) DO WE PROCESS YOUR PERSONAL DATA OUTSIDE THE EU OR EEA?

Your personal data may be processed in third countries outside the EU and EEA in the course of carrying out various process steps in the Sumsb service. In these situations, we ensure an appropriate level of data protection, for example through the Commission's standard clauses and other similar arrangements.

7) WHY AND HOW DO WE USE PROFILING IN PROCESSING PERSONAL DATA?

We use profiling in our efforts to comply with the Money Laundering Act. In this case, we use various digital services to automatically get to know our customers in the manner required by the Money Laundering Act.

With profiling, we primarily aim to (i) ensure that our customers do not use our services for illegal purposes, (ii) verify the customer's identity, and (iii) identify our customer's usual way of using the services so that we can detect and intervene in unusual activities.

Profiling is carried out automatically by combining various personal data of the customer and the customer's use of our service. Profiling may include automated decisions that have an impact on the rights and obligations of the Bittimaatti user. However, all possible automated decisions are also subject to manual processing if necessary.

8) HOW LONG DO WE KEEP YOUR PERSONAL DATA?

Under the Money Laundering Act, we are obliged to retain information related to our customers' customer relationships for at least five (5) years from the end of the customer relationship. Other personal data is retained for as long as necessary to fulfill the purpose of the processing in question.

We regularly check the adequacy of the information in the registers and keep records of the checks.

9) WHAT ARE YOUR DATA PROTECTION RIGHTS?

You may be entitled to exercise your rights under the EU General Data Protection Regulation (679/2016):

- Right of inspection ([art. 15](#))
- Right of rectification ([art. 16](#))
- Right of erasure ([art. 17](#))
- Right to restriction ([art. 18](#))
- Right to data portability ([art. 20](#))
- Right to object ([art. 21](#))
- The right to object to automated individual decisions, including profiling ([art. 22](#))

Any communication regarding your rights must be made in writing to the controller's contact person. Your rights can only be exercised once your identity has been properly verified.

You may have the right to lodge a complaint with the Data Protection Officer if you believe that the processing of personal data concerning you violates data protection laws.

10) CAN THE PRIVACY NOTICE BE CHANGED?

We may unilaterally change the Privacy Notice. We will update the Privacy Notice as necessary, for example when there are changes in legislation. Changes to the Privacy Notice will take effect immediately when we publish the updated version on our website.

If we make significant changes to the privacy notice, or if the way it is used changes significantly, we will notify Bittimaatti users.