

PRIVACY NOTICE

Updated 31.12.2025 JMO

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

1) WHAT TERMS ARE USED IN THIS PRIVACY NOTICE?

Personal data means any information relating to a Bittimaatti user or information that can identify them.

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

Purpose of processing means the reason why the controller processes the personal data of a Bittimaatti user.

Legal basis refers to the legal grounds under which the controller processes the personal data of a Bittimaatti user. Legal bases are described in Article 6 of the GDPR.

Profiling means the automated processing of personal data to evaluate a Bittimaatti user's personal characteristics.

Anti-Money Laundering Act means the Act on Preventing Money Laundering and Terrorist Financing (444/2017).

Controller means Bittimaatti Oy, which is responsible for processing the user's personal data.

Privacy notice refers to the document prepared under Articles 13 and 14 of the GDPR informing Bittimaatti users about how their personal data is processed.

2) CONTROLLER'S CONTACT DETAILS

The controller of your personal data is Bittimaatti Oy.

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

If you have questions about your personal data, you may contact our Data Protection Officer at: support@bittimaatti.fi.

If you have questions about this privacy notice, you may also contact our Data Protection Officer at: support@bittimaatti.fi.

3) WHY DO WE PROCESS YOUR PERSONAL DATA?

We process our customers' personal data for providing and developing our services, for communication purposes, and to comply with obligations under the Anti-Money Laundering Act.

Our legal bases for processing personal data depend on the purpose of processing. We use the following legal bases:

- (i) performance of a contract with our customers,
- (ii) statutory obligations under the Anti-Money Laundering Act,
- (iii) consent under the Payment Services Act (290/2010) for payment services,
- (iv) our legitimate interest in developing our services and communication.

We process the following personal data: name, basic and contact details, date of birth, information on the use of our services, and information required under the Anti-Money Laundering Act. If the user has also registered as a Coinmotion service user, Coinmotion Oy acts as the controller for data relating to the Coinmotion service.

4) WHERE DO WE COLLECT YOUR PERSONAL DATA?

We collect your personal data from you (including your device and browser) when you use our services, as well as from our partners (e.g., AML compliance service providers), authorities, and public sources (e.g., trade register).

Service providers collect publicly available data from your social media accounts, news, and articles to prevent fraud, money laundering, and terrorist financing.

5) DO WE DISCLOSE YOUR PERSONAL DATA TO OTHERS?

As a rule, we do not disclose your personal data to third parties. If legislation or authorities require us to disclose your data, we assess the legality of such disclosure together with our Data Protection Officer.

We do not share (transfer) your personal data with others as part of our normal business operations when using digital services or AML compliance services. Transfers are performed securely and based on appropriate data protection agreements.

We may disclose data to authorities to comply with tax reporting obligations under the Act on Reporting Obligations of Crypto-Asset Service Providers for Taxation Purposes (1041/2025).

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

Your personal data may be processed in third countries outside the EU/EEA within the Sumsub service when performing various process stages. In these cases, we ensure an adequate level of data protection by using, for example, the European Commission's Standard Contractual Clauses and other similar arrangements.

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

We use profiling to comply with the Anti-Money Laundering Act. We aim to automatically identify our customers as required by law by using various digital services.

Through profiling, we primarily aim to:

- (i) ensure that customers do not use our services for unlawful purposes,
- (ii) verify customer identity, and

(iii) identify customers' usual service usage patterns to detect unusual activity and intervene when necessary.

Profiling is carried out automatically by combining different categories of personal data with service usage data. Profiling may include automated decisions affecting users' rights and obligations. However, all automated decisions can be reviewed manually if needed.

8) HOW LONG DO WE STORE YOUR PERSONAL DATA?

Under the Anti-Money Laundering Act, we are required to retain customer relationship data for at least five (5) years after the end of the customer relationship. Other personal data is retained as long as necessary to fulfill the purpose of processing.

Tax-related data must be retained for six years following the end of the customer relationship or the year in which the transaction was carried out.

We regularly review the necessity of the data stored and document our checks.

9) WHAT ARE YOUR DATA PROTECTION RIGHTS?

You may have the right to exercise your rights under the GDPR (679/2016):

- Right of access (Art. 15)
- Right to rectification (Art. 16)
- Right to erasure (Art. 17)
- Right to restriction of processing (Art. 18)
- Right to data portability (Art. 20)
- Right to object (Art. 21)
- Right to object to automated decision-making, including profiling (Art. 22)

Requests to exercise your rights must be made in writing to the controller's contact person. Your rights can only be exercised once your identity has been appropriately verified.

You may have the right to lodge a complaint with the Data Protection Ombudsman if you believe your personal data has been processed in breach of data protection legislation.

10) CAN THIS PRIVACY NOTICE BE CHANGED?

We may unilaterally update this privacy notice. We update the notice when necessary, for example due to changes in legislation. Changes take effect immediately upon publication on our website.

If we make significant changes or if the purpose of use changes substantially, we will notify Bittimaatti users.