

PRIVACY NOTICE

VALID FROM 29/12/2025 JMO

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

1) WHAT CONCEPTS ARE USED IN THIS PRIVACY NOTICE?

Personal data means any information relating to a Bittimaatti user or information by which they can be identified.

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 the Bittimaatti user.

Legal basis means the legal basis on which the controller processes the personal data of the Bittimaatti user. The legal bases are described in Article 6 of the GDPR.

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

Money Laundering Act means the Act on the Prevention of Money Laundering and Terrorist Financing (444/2017) applicable to us.

Controller Bittimaatti Oy is the party responsible for the processing of the user's personal data.

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

2. CONTACT INFORMATION OF THE CONTROLLER

Bittimaatti Oy acts as the controller of your personal data.

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

If you have any questions related to your personal data, you can contact the data protection officer via the following email address: support@bittimaatti.fi.

If you have any questions related to the privacy notice, you can contact our data protection officer via the following email address: support@bittimaatti.fi.

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

In our operations, we process the following personal data: name, basic and contact information, date of birth, information related to 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 controller in relation to the Coinmotion service.

4. WHERE DO WE COLLECT YOUR PERSONAL DATA?

We collect personal data concerning you from yourself (including the terminal device and browser you use) when you use our services, as well as from our cooperation partners (e.g., service providers used for compliance with the Money Laundering Act), authorities, and public sources (e.g., the trade register). On our behalf, service providers collect publicly available information from your social media accounts and from news and articles to prevent fraud, money laundering, and terrorist financing.

5. DO WE DISCLOSE YOUR PERSONAL DATA TO OTHERS?

In principle, 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 we use various digital services or services intended for compliance with the Money Laundering Act. Transfers are implemented securely and pursuant to appropriate data processing agreements.

We disclose statutory information to the authorities to fulfill the reporting obligation regarding taxation. The key applicable legislation is the Act on the Reporting Obligation of Reporting Crypto Asset Service Providers in the Field of Taxation (1041/2025).

The data to be reported may include, among other things:

- Customer identification data and tax identifier (TIN).
- Total values and numbers of crypto asset transactions carried out during the reporting period.

The processing of data is based on the controller's compliance with a statutory obligation (EU General Data Protection Regulation GDPR, Article 6, paragraph 1, point c).

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 Sumsub service during different process phases. In these situations, we ensure an adequate level of data protection, for example, with the Commission's standard contractual clauses and other similar arrangements.

1. WHY AND HOW DO WE USE PROFILING IN THE PROCESSING OF PERSONAL DATA?

We use profiling in our efforts to comply with the Money Laundering Act. In such cases, we aim to automatically know our customers in the manner required by the Money Laundering Act through various digital services.

Profiling aims primarily to (i) ensure that our customer does not use our services for illegal purposes, (ii) verify the customer's identity, and (iii) identify the customer's customary way of using the services so that we can detect and intervene in unusual activities.

Profiling is carried out automatically by combining the customer's various personal data and the customer's use of our service. Profiling may include automated decisions that affect the rights and obligations of the Bittimaatti user. However, all possible automated decisions can also be subjected to manual processing if necessary.

7. HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

Under the Money Laundering Act, we have an obligation to retain information related to our customers' customer relationship for at least five (5) years from the end of the customer relationship. Other personal data is retained for as long as it is necessary for the purpose of the respective processing. Taxation data is retained for six years after the year the customer relationship ended or the transaction was completed.

We regularly check the necessity of the data in the registers and keep a record of the checks.

1. WHAT ARE YOUR RIGHTS RELATED TO DATA PROTECTION?

You may have the right to exercise the rights under the EU General Data Protection Regulation (679/2016):

- Right of access ([art. 15](#))
- Right to rectification ([art. 16](#))
- Right to erasure (Right to be forgotten) ([art. 17](#))
- Right to restriction of processing ([art. 18](#))
- Right to data portability ([art. 20](#))
- Right to object ([art. 21](#))
- Right not to be subject to a decision based solely on automated processing, including profiling ([art. 22](#))

Requests regarding these rights must be made in writing to the controller's contact person. Your rights can only be implemented once your identity has been verified in an appropriate manner.

You may have the right to lodge a complaint with the Data Protection Ombudsman if you consider that the processing of your personal data violates data protection laws.

8. CAN THE PRIVACY NOTICE BE CHANGED?

We can unilaterally change the privacy notice. We update the privacy notice when necessary, for example, when there are changes in legislation. Changes to the privacy notice become effective immediately when we publish an updated version of it on our website.

If we make significant changes to the privacy notice, or if its use changes significantly, we will notify Bittimaatti users of the matter.