

PRIVACY POLICY

Version: 1.2 of 31 December 2025

This privacy policy (the "**Policy**") describes how DNZ HOLDING LTD, a company incorporated and existing under the laws of England and Wales, with its registered seat at Old Gloucester Street 27, London, WC1N 3AX, United Kingdom, company number 13059338 ("**Controller**" or "**we**"), processes the personal data of:

- (a) users of the BitDCA platform operated by the Controller, and of other information society services provided by the Controller from time to time, including the website <https://www.bitdca.com/> (together the "**Services**"), in connection with the operation of such Services;
- (b) other individuals dealing with the Controller in the ordinary course of the Controller's business, including other cryptocurrency trades with the Controller; and
- (c) candidates for new positions with the Controller in connection with the recruitment for such positions.

We provide this information in accordance with the UK General Data Protection Regulation ("**UK GDPR**") and the Data Protection Act 2018 ("**DPA 2018**"), which together govern the protection of personal data in the United Kingdom.

1 CONTROLLER

1.1 The person responsible for your personal data – their Controller – is:

DNZ HOLDING LTD, a company incorporated and existing under the laws of England and Wales, with its registered seat at Old Gloucester Street 27, London, WC1N 3AX, United Kingdom, company number 13059338

1.2 If you have questions regarding this Policy or wish to exercise any of the rights described in section 8 (*Your Rights*), you may reach us:

- (a) by email at info@bitdca.com;
- (b) by post or another delivery service at the Controller's registered office address; or
- (c) in any other manner specified elsewhere in this Policy or directly in the Services interface.

2 PERSONAL DATA

2.1 Categories of Personal Data

Taking into account all the ways you typically interact with us, we process the following categories of personal data related to you:

Category	Examples
Identification Data	Name and surname; date of birth.
Contact Data	E-mail address; telephone number; home address; bank details.
AML Data	Identification and contact details; nationality, citizenship; permanent residence; tax residency; subject/type of business; origin of funds; copy of national ID or passport; bank account details; details of inclusion on sanctions lists; political exposure details; other data necessary to carry out checks under anti-money laundering legislation.
User Data	Information tied to the user account through which you use the Services. This includes, for example, your user account settings and the information you enter into your account (such as identification and contact details), details of contractual relationships with you, your transaction history with us, your preferences regarding the sending of commercial communications and other privacy matters, as well as details of complaints and other exercises of rights; it also includes analytical and statistical information derived from the above.

Transaction Data	Any personal information regarding transactions (contracts, payments etc.) between you (directly or an organisation which you represent) and the Controller, including orders, bank account numbers, contact addresses etc.
Payment Data	Details of the payment card and bank account which you have paired with the Services.
Device Data	IP address of your terminal device and the approximate location derived from it; MAC address; type, version and technical parameters of your device and internet browser; time zone of the device; analytical and statistical information derived from the above.
Usage Data	Information on how you use the Services, e.g. what you click on, how much time you spend on various features or sections of the Services and how you move around these features or sections; analytical and statistical information derived from any such data.
E-Mail Interaction Data	Data about if and when you read our direct marketing e-mails and what links you click on; analytical and statistical information derived from any such data.
Candidate Data	CV; cover letter; education and professional experience; information provided during interviews and related assessments; interview and assessment performance data; previous employer references; evaluation of all of the information above so as to assess whether you are a good fit for a given role; data necessary for the preparation of a contract of employment/services and compliance with employment-related regulations.
Communication Data	The contents of any communications exchanged between you and us, including any personal data contained in such communications which you choose to give to us.

2.2

Sources of Your Data

In general, the personal information we process comes from you or is derived from your use of the Services, as described in this Policy. In some cases, we may obtain your personal information from external sources, such as:

- (a) in the process of conducting AML/KYC checks while registering you for the Services or onboarding you as an investor, we may receive some of the AML Data (mostly in the form of results of such checks) from specialised AML/KYC service providers;
- (b) if you're one of our investors/supporters, we may receive some of your registration information, investment details, orders and other Transaction Data from the brokers you've engaged with;
- (c) if you use our Services, we may receive Payment Data from card issuers, account information service providers and other payment service providers who assist us with processing payments, verifying your Payment Data or loading your bank account transaction history into our Services;
- (d) if you apply for a job with us, some of your Candidate Data may be collected from your LinkedIn account, recruitment agencies and websites, and your current or previous employers; and
- (e) if we need particular personal data related to you for the purpose of establishing, exercising or defending our rights against you, or for meeting a legal obligation, we can also obtain that piece of data from public registries, public authorities and any other external sources, as needed for the specific purpose.

2.3 Choosing Not to Share Your Data

In principle, you don't need to share any of your personal data with us if you don't want to. However, in some cases, a failure to do so will result in our inability to enter into a transaction with you, provide a service, or act upon your request. For example:

- (a) if providing certain data is necessary for the preparation or fulfilment of a contract between us, or for meeting a legal obligation which applies in connection with the subject matter of that contract, we won't be able to enter into the contract;
- (b) if we are required to conduct identity, source of funds or other checks under anti-money laundering laws before transacting with you, we won't be able to proceed unless you give us the necessary AML Data;
- (c) if you apply for a job with us and refuse to provide the requested Candidate Details through the designated online form or to an HR colleague, your application might be incomplete, and we won't be able to consider you for the role; and
- (d) if you wish to exercise one of the rights described in section 8 (*Your Rights*), we need to confirm your identity and fully understand the nature and scope of your request. If you don't help us verify your identity or define your request, we might not be able to assist you.

3 PROCESSING PURPOSES

This section explains why we process your personal data ('purposes of processing') and what entitles us to do so ('legal basis for processing').

3.1 Provision of Services

3.1.1 Description

If you're a user of our Services, we process your Identification Data, Contact Data, AML Data, User Data, Transaction Data, Payment Data and Communication Data for the purpose of providing you with the Services. This includes:

- (a) creating and maintaining your user account;
- (b) enabling you to execute cryptocurrency transactions;
- (c) providing customer and technical support and evaluating and handling your requests (e.g., complaints or exercises of privacy rights) and complaints made in connection with the Services; and
- (d) communicating with you regarding the above.

3.1.2 Legal basis

The processing is necessary for the preparation or performance of our contract with you (i.e. the provision of the Service you request from us) (*Article 6(1)(b) UK GDPR*).

3.2 Other Business

3.2.1 Description

If you're our investor, customer, supplier or another business partner and are dealing with us in a context other than the interaction with Services, we may use your Identification Data, Contact Data, Transaction Data and Communication Data to communicate and do business with you (in accordance with any contract we might have, if applicable), and to administer our business relationship with you on an ongoing basis. This includes the preparation, negotiation and performance of our legal agreements with you or the organisation you represent, accepting or making payments from/to you, and the processing of any requests and queries you might have.

3.2.2 Legal basis

The processing is necessary for the preparation or fulfilment of our contract with you (*Article 6(1)(b) UK GDPR*), or, where no contract is in place and we are not negotiating one, because it is necessary for the proper operation and administration of our business, in which we have a legitimate interest (*Article 6(1)(f) UK GDPR*).

3.3 **Compliance with Legal Obligations**

3.3.1 Description

We process your Identification Data, Contact Data, AML Data, User Data, Transaction Data, Communication Data and other personal data to the extent necessary to comply with legal obligations. For illustration, this could be:

- (a) an obligation to demonstrate compliance with consumer protection requirements pursuant to the Consumer Rights Act 2015 and the Consumer Protection from Unfair Trading Regulations 2008 (in which case mainly your User Data, Transaction Data and Communication Data will be used);
- (b) an obligation to document and implement or respond to your preferences, questions, objections, right exercises and other communications regarding the treatment of personal data in accordance with the UK GDPR, the DPA 2018, and the Privacy and Electronic Communications Regulations 2003 (in which case mainly your User Data and Communication Data will be used);
- (c) an obligation to archive or present corporate, accounting and tax materials in accordance with the Companies Act 2006, the Value Added Tax Act 1994, and other applicable UK tax and accounting regulations (in which case mainly your User Data and Transaction Data will be used);
- (d) an obligation to conduct KYC/AML checks in accordance with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (in which case mainly your AML Data will be used); or
- (e) an obligation to disclose evidence or other documentation to public authorities.

3.3.2 Legal basis

The processing is necessary for the performance of our legal obligations (*Article 6(1)(c) UK GDPR*).

3.4 **Technical Operation and Improvement of Services**

Description	Legal basis
<u>Secure functioning</u> . If you use Services such as websites or mobile applications, we process your Device Data to ensure that the Service functions properly and securely. You should also note we use cookies for these purposes – see section 4 (<i>Cookies</i>) below.	The processing is necessary for the fulfilment of our contract with you relating to the provision of the Services (<i>Article 6(1)(b) UK GDPR</i>).
<u>Improvement of performance</u> . If you use Services such as websites or mobile applications, and you give us consent, we'll process your Usage Data to improve its performance and user-friendliness, including the testing of various versions of the Service and its functionalities, measuring of user engagement, and the creation of various reports, analyses and statistics based on the above. We use cookies for these purposes – see section 4 (<i>Cookies</i>) below.	The legal basis for such processing is your voluntary consent (<i>Article 6(1)(a) UK GDPR</i>). Once given, your consent is valid for as long as the respective analytics cookie remains active – see section 4 (<i>Cookies</i>) below. You may withdraw your consent at any time by opting out of analytics cookies in the respective Service. Such withdrawal will, however, not affect the lawfulness of processing based on the consent before its withdrawal.

3.5 **Recruitment**

Description	Legal basis
<u>Hiring process</u> . If you apply for a job with us, we'll use your Identification Data, Contact Data and Candidate Data for the purpose of conducting the recruitment process and assessing your suitability for the relevant position.	The processing is necessary for determining whether or not, following your application, we should enter into a contract of employment/contract for services with you (<i>Article 6(1)(b) UK GDPR</i>).

<p><u>Job offers.</u> If you apply for a job with us and give us consent, we'll include your Identification Data, Contact Data and Candidate Data in a candidate database and potentially contact you with relevant job offers with the Controller in the future.</p>	<p>The legal basis for such processing is your voluntary consent (<i>Article 6(1)(a) UK GDPR</i>). Once given, your consent is valid for a period of five years. You may withdraw your consent at any time by getting in touch with us. Such withdrawal will not, however, affect the lawfulness of processing based on the consent before its withdrawal.</p>
---	--

3.6

Marketing

Description	Legal basis
<p><u>Marketing communications.</u> If you have created a user account with us without opting out of receiving marketing communications, or if you have proactively subscribed to our marketing communications without opening an account, we may use your Identification Data and Contact Data to serve you news, offers or other commercial communications about our Services by e-mail.</p>	<p>If you have created a user account with us without opting out of marketing communications, the legal basis is our legitimate interest in maximising user awareness about our Services and growing business through direct marketing activities (<i>Article 6(1)(f) UK GDPR</i>). You may always opt out of such communications by clicking the unsubscribe button in a marketing e-mail, adjusting marketing settings in the Service interface (if available at the time) or letting us know in a different manner.</p> <p>If you've proactively subscribed to our marketing communications (whether or not you also have an account with us), the legal basis for serving you marketing communications is your voluntary consent (<i>Article 6(1)(a) UK GDPR</i>). Once given, your consent is valid indefinitely. You may withdraw your consent at any time by clicking the unsubscribe button in a marketing e-mail, adjusting marketing settings in the Service interface (if available at the time) or letting us know in a different manner. Withdrawing consent does not affect the lawfulness of processing carried out on the basis of such consent prior to withdrawal.</p>
<p><u>Direct marketing analytics.</u> If you read or further interact with a marketing or similar mass communication from us sent via MailChimp or an equivalent mailing service, we'll receive your E-Mail Interaction Data and be able to use it for various (internal) analytical purposes.</p>	<p>The processing is necessary for our legitimate interest of evaluating the performance of our marketing communications (<i>Article 6(1)(f) UK GDPR</i>). You can opt out of marketing communications at any time by clicking the unsubscribe button in a marketing e-mail, adjusting marketing settings in the Service interface (if available at the time) or letting us know in a different manner.</p>
<p><u>Targeting.</u> If you use our Services and give us consent, we'll collect and hand some of your Usage Data over to third parties so that they can serve you more relevant ads. We use cookies for these purposes – see section 4 (<i>Cookies</i>) below.</p>	<p>The legal basis for such processing is your voluntary consent (<i>Article 6(1)(a) UK GDPR</i>). Once given, your consent is valid for as long as the respective marketing cookie remains active – see section 4 (<i>Cookies</i>) below. You may withdraw your consent at any time by opting out of marketing cookies in the respective Service. Such withdrawal will, however, not affect the lawfulness of</p>

	processing based on the consent before its withdrawal.
--	--

3.7 Protection of Legal Claims

3.7.1 Description

If (a) you are our customer or have a work or business relationship with us, (b) cause us or another person damage/harm, or (c) we enter into a legal dispute, we may store, share and further use your personal data for the purpose of establishing, exercising and defending our or another affected person's rights against you.

3.7.2 Legal basis

The processing is necessary for the affected person's legitimate interest in establishing, exercising and defending its rights against you (*Article 6(1)(f) UK GDPR*).

3.8 Other Purposes

Description	Legal basis
<u>Dealings not described elsewhere.</u> If you turn to us with a request or question or otherwise communicate with us in a context not specifically addressed elsewhere in this Policy, we'll use your Identification Data, Contact Data and Communications Data for achieving the purpose of the communication.	We're entitled to do so either because you have voluntarily contacted us with the personal data and asked us (given us consent) do something with it (<i>Article 6(1)(a) UK GDPR</i>), or, in other cases, because it's necessary for our legitimate interest of properly handling all communications addressed to us (<i>Article 6(1)(f) UK GDPR</i>).
<u>M&A transactions.</u> If a third party ('an investor') is interested in acquiring, directly or indirectly, the whole or a part of our business (a 'transaction'), we may (a) grant the investor and its advisors very limited access to your personal data so that the investor may conduct due diligence on our business, and (b) following the transaction, transfer your personal data to the investor such that it can process the data for the same or compatible purposes as we have been.	The processing is necessary for our and the investor's legitimate interest in (a) preparing and executing the transaction properly (including the proper evaluation of our business and assets) and (b) ensuring smooth migration of our business to the investor following the transaction (<i>Article 6(1)(f) UK GDPR</i>).
<u>Analytics.</u> We may use your personal data for the purpose of creating various internal reports, analytics, statistics and financial models.	The processing is necessary for our legitimate interest in maximising insight into business performance (<i>Article 6(1)(f) UK GDPR</i>).
<u>Free use of anonymised data.</u> We may also anonymise your personal data and use such anonymised data for any purposes whatsoever, such as the inclusion of the anonymised data in various materials which may then be shared with, or even sold to, third parties, or the commercialisation of the anonymised data in any other manner we deem fit.	The processing is necessary for our legitimate interest in sharing insights into our business performance with our stakeholders and other third parties, and, potentially, commercialising such insights (<i>Article 6(1)(f) UK GDPR</i>).

4 COOKIES

4.1 If you use our Services, we'll store small files called 'cookies' on your device and read them as you continue interacting with the Services. You may encounter the following types of cookies in our Services:

- (a) Strictly necessary cookies. These cookies are necessary for the website to work properly and cannot be turned off unless you do so in your browser settings.
- (b) Personalisation cookies. Personalisation/preference cookies allow the website to remember certain choices you make (such as your preferred language version) and as a result provide personalised features. They will only be used if you accept them proactively.

- (c) Analytical cookies. Analytical/statistical cookies collect data about how you visit, navigate and interact with the website so that we can get to know our audience or improve the website gradually. The Google Analytics service is a good example of this type of cookies. These cookies will only be used if you accept them proactively.
- (d) Marketing. Marketing cookies are used to deliver advertisements which are relevant to you and your interests. They are also used to limit the number of times you see an advertisement and to help measure the effectiveness of our or others' advertising campaigns. Information extracted from marketing cookies may be shared with third parties, such as social network operators or advertising agencies. These cookies will only be used if you accept them proactively.

4.2 Please refer to the cookie settings of our Services to learn more about the specific cookies we set. You can use such settings to adjust your cookie preferences; this doesn't apply to strictly necessary cookies, which are set automatically and cannot be disabled.

4.3 If you'd like to avoid cookies altogether, you can restrict or prohibit their storage in the settings of your browser. This is how to do it on the most prominent browsers:

[Google Chrome](#)

[Microsoft Edge](#)

[Microsoft Internet Explorer](#)

[Safari](#)

[Mozilla Firefox](#)

[Opera](#)

You can opt out of Google Analytics tracking completely [here](#).

5 PERSONS WITH ACCESS TO YOUR DATA

We may engage the following individuals and organisations in processing your personal data for the purposes described above:

- (a) companies controlling, controlled by, or under the control of the same person as, the Controller (together with the Controller, the "**Group**");
- (b) professional advisors (e.g. lawyers, business/management/marketing consultants, tax and accounting advisors and auditors) which provide services to the Group;
- (c) brokers helping the Controller onboard new investors and process their investments;
- (d) AML/KYC experts assisting the Controller with conducting statutory checks;
- (e) banks and other payment services providers used by the Controller to process payments or verify bank accounts;
- (f) providers of software and other technical infrastructure (e.g. cloud and hosting services);
- (g) providers of analytical or ad targeting services (mainly Google via the Google Analytics service and Facebook via its marketing cookies);
- (h) other providers of ordinary, foreseeable services necessary for the proper operation of our business;
- (i) persons directly or indirectly acquiring or investing in our business, and their representatives;
- (j) public authorities (e.g. courts, the police, regulatory authorities and various state bodies) where so required by law or where this is necessary for the achievement of legitimate aims; and
- (k) any such other individuals or organisations which you permit or instruct us to give your personal data to.

6 DATA EXPORT

6.1 We may transfer some of your personal data outside of the United Kingdom and the European Economic Area where the (UK) GDPR doesn't apply. This will typically (but not exclusively) be the United States, in which case we will leverage the UK Extension to the EU-U.S. Data Privacy Framework, use the International Data Transfer Agreement (IDTA) or the UK Addendum to

the standard contractual clauses (SCCs) approved by the UK Government or other safeguards accepted by the UK GDPR.

- 6.2 In any event, we will only export your personal data outside of the United Kingdom and the European Economic Area either (a) if the territory in question is subject to an adequacy decision (see above) or (b) if appropriate safeguards are in place in accordance with the UK GDPR and your data subject rights and effective legal remedies are preserved.

7 RETENTION PERIOD OF PERSONAL DATA

- 7.1 As a general rule, we store your data until they are no longer necessary for the achievement of the purposes we process them for. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the data, the potential risk of harm from its unauthorised disclosure or other processing, the purposes for which we process the data and whether we can achieve those purposes through other means, as well as the applicable legal, regulatory, tax, accounting or other requirements. Once we no longer need your data, we will either erase (destroy) it, anonymise it, or, if this is not possible, then we will securely archive your data and isolate it from any further use until deletion is possible.

- 7.2 To give you a more exact idea, the following are some of the more specific principles we follow:

- (a) if you've ever created a user account with us, we will retain all User Data and Transaction Data associated with such account over the entire lifetime of the account plus ten years;
- (b) if we process a certain piece of personal data based on your consent and you withdraw such consent or the consent expires, we'll erase the data after such withdrawal or expiration unless this Policy states we may process the data for a different purpose, on a different legal basis;
- (c) if we are required by law to retain a certain piece of personal data (see e.g. the Limitation Act 1980, Taxes Management Act 1970, or the Money Laundering Regulations 2017), we'll keep the data for as long as the law prescribes, irrespective of any default retention period;
- (d) if we find ourselves in a dispute with you, we'll keep personal data needed to establish, exercise or defend our rights in such dispute (see section 3.7 (*Protection of Legal Claims*)) at least until such time the dispute has been concluded and we no longer owe each other anything, irrespective of any default retention period;
- (e) if we anonymise a certain piece of data, we can retain it indefinitely.

- 7.3 In some cases, you have the right to demand that we erase your personal data – see section 8.4 (*Right to Erasure*).

8 YOUR RIGHTS

8.1 General

- (a) In order to retain control over your personal data, you have a multitude of rights at your disposal. Such rights are summarised further in this section, but note this summary is simplified and you should read the UK GDPR and the DPA 2018 or obtain independent legal advice to obtain a full picture.
- (b) If you wish to exercise one of your rights or want to raise another request or query in connection with your personal data, please reach out using one of the means set out in section 1.2.
- (c) We'll respond to your request and let you know what steps we've decided to take in relation to it as soon as possible, and no later than one month from the time we've received a clear, complete request from you and have verified your identity. Particularly complicated requests might exceptionally take us up to two more months to process – we'll let you know if this happens to be the case.

8.2 Right of Access

You may at any time request confirmation as to whether we process personal data concerning you and, if so, for what purposes, to what extent, to whom they are disclosed, for how long we will process them, whether you have the right to rectification, erasure, restriction of processing or objection or to file a formal complaint, where we have obtained the personal data and whether automated decision-making, including profiling, occurs on the basis of the processing of your personal data. In addition,

you have the right to obtain a copy of your personal data, the first provision of which is free of charge (we may charge a reasonable administrative fee for the provision of further copies).

8.3 **Right to Rectification**

You can ask us to correct or complete your personal data at any time if it is inaccurate or incomplete.

8.4 **Right to Erasure ('Right to Be Forgotten')**

You can ask us to erase your personal data if:

- (a) it is no longer necessary for the purposes for which it was collected or otherwise processed;
- (b) it is processed based on your consent, you withdraw such consent and no other legal basis for processing is available;
- (c) you object to the processing and there are no overriding legitimate grounds for the processing;
- (d) its processing is unlawful; or
- (e) we are required to do so by law.

Please note that the right to erasure is not absolute (unconditional); for example, we may not be able to delete your data if we need to retain it in order to establish, exercise or defend legal claims, or if an important public interest prevents erasure.

8.5 **Right to Restriction of Processing**

Where one of the following circumstances applies, you can ask us to pause ('suspend') processing your personal data with the exception of storage, and to only use them for establishing, exercising or defending legal claims or for purposes with which you give consent:

- (a) you challenge the accuracy of the processed data (in which case we'll restrict its processing until we verify accuracy);
- (b) processing of the data is unlawful and you don't want us to erase it;
- (c) we no longer need the data for the purposes for which it was collected or otherwise processed; or
- (d) you have objected to the processing and there are no overriding legitimate grounds for the processing (in which case we'll restrict its processing pending our assessment of the legitimate grounds).

8.6 **Right to Object**

You have the right to object to the processing of personal data that we process for direct marketing purposes (see e.g. section 3.6 (*Marketing*)) or for processing based on our or others' legitimate interests. If you object to processing for direct marketing purposes, your personal data will no longer be processed for these purposes; in other cases, we'll stop the processing activity if your own interests outweigh our interests in continuing the processing.

8.7 **Right to Data Portability**

You have the right to obtain personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format, as well as the right to transfer this data to another controller if the processing of this data is based on consent or a concluded contract and this processing is automatic.

8.8 **Right to Lodge a Complaint**

While we will always appreciate if you contact us first in case of any requests regarding the processing of personal data, you always have the right to file a complaint to the supervisory authority. In our case this is the Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom (www.ico.org.uk).

9 **FINAL PROVISIONS**

9.1.1 This Policy becomes effective on the date first written above.

9.1.2 We may make changes to this Policy at any time, in which case we'll publish a new version of it on our website.

9.1.3 This Policy is governed by the laws of England and Wales.