



## Privacy Notice

Last updated: September 16th, 2025

This privacy notice ("**Privacy Notice**") applies to all Personal Data processing activities carried out by Bullish Europe GmbH ( "**Bullish**", "**we**", "**us**" or "**our**") within the scope described under section 3 of this Privacy Notice.

In this Privacy Notice, "Personal Data" are any information which are related to an identified or identifiable natural person (Article 4 No. 1 GDPR).

We are committed to protecting your privacy. By accessing Bullish Services you acknowledge and fully understand Bullish's privacy practices described in this Privacy Notice.

By accessing and using our Service, you signify your acceptance to the terms of this Privacy Notice. If you do not agree with or you are not comfortable with any aspect of this Privacy Notice, you should immediately discontinue access or use of our Services.

### 1. Who we are

Bullish acts as the data controller for your Personal Data unless a different affiliate is named in a separate privacy notice, or we have identified a different data controller for a particular processing operation.

We respect an individual's rights to privacy and are committed to protecting your privacy when processing your Personal Data.

### 2. Purpose of this Privacy Notice

The purpose of this Privacy Notice is to explain how we collect and use Personal Data in connection with our business.

This Privacy Notice explains how we demonstrate this commitment in compliance with the requirements under Article 12 to 14 of the General Data Protection Regulation ("GDPR"), including by informing about:

- (a) the types of Personal Data we collect in connection with the scope described section 3 of this Privacy Notice;
- (b) the manner and purposes in which we process the Personal Data, as well as the legal basis;
- (c) the recipients of your Personal Data as well as details and circumstances in which your Personal Data may be transferred to another country;
- (d) the rights you may have under relevant privacy or data protection laws;
- (e) the period for which the Personal Data will be stored or the criteria used to determine that period;
- (f) Information about whether the provision of Personal Data is necessary or not and whether we use automated decision-making, including profiling;
- (g) cookies that we use or used by our service providers; and

(h) how you can contact us regarding our processing activities or this Privacy Notice.

### 3. Scope

This Privacy Notice applies to your use of, access to, or participation in any of the following sources (collectively, our **"Data Sources"**):

- our products, services, applications or software offered through the Bullish Website or mobile application, including any communications with you about our Services (our **"Services"**), unless a separate privacy notice or policy is expressed to apply in respect of such Service;
- any Bullish website (URL: [www.bullish.com](http://www.bullish.com)) or subdomains regardless of the medium in which the websites are accessed by a user (e.g., via a web or mobile browser) and any apps owned by Bullish (the **"Websites"**);
- any events hosted by us, whether such events are open to the public or by invitation (collectively the **"Events"**); and
- subsections of social media platforms (e.g. LinkedIn) controlled by us.

### 4. Personal Data We Process

We process the Personal Data we collect about you when you use, gain access to, or participate in our Data Sources.

A "data subject" is a person who can be directly or indirectly identified by personal data.

Typically, this is done by referencing an identifier such as a name, identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of a natural person.

Personal data also includes separate pieces of information that, when combined, can lead to the identification of a particular individual. It excludes information from which the identity has been removed. (anonymous data).

We collect Personal Data through:

- Your use of or participation in our Data Sources. For example, we may collect Personal Data from you when we onboard you as a client. A third party's use of our Data Sources relating to you, for example where a third party may manage a Service or Event on our behalf.
- Direct or unsolicited interactions, such as when you voluntarily provide your information to us by contacting us, submitting requests and comments, subscribing to our newsletters, submitting job applications, or otherwise engaging with us through our Data Sources. For example, we may collect Personal Data from you when you sign up for a marketing newsletter.
- Indirectly, such as through public or media Websites or government Websites when conducting user identity verifications and reviews.

You must ensure that all information provided by you to us is accurate, comprehensive, and current. Inaccurate or insufficient Personal Data you provide may have a negative impact on how we interact with you in the course of our business.

We may collect, use, retain, and transfer various types of personal data about you depending on whether and how you use our services or data sources, which we have categorised as follows:

Categories of personal data	Examples
Personal Identification data	such as full name, title, date and place of birth, gender, signature, nationality, photograph, live portrait selfie, email address, residential address, mailing address, telephone number, marital status.
Social Identification data	such as your group or company data, job title and work experience, office location, close connections, and behavioural data.
Transactional data	which includes account and authentication information; your username, user identification number; billing, contact details or cryptocurrency wallet address (including public key); transaction and account status information; and payment information, such as your credit or debit card number and other card information. Government Issued Identification Information, such as passport copy, Tax identification number, visa information and any other information we may request in order to comply with our legal obligation under financial, tax and anti-money laundering laws.
Financial data	such as bank account information, payment card primary account number, transaction history, trading history, trading data and tax identification, including source of wealth and source of funds.
Contact and Correspondence data	which means residence details, billing address, delivery address, home address, work address, email address and telephone numbers, proof of address documentation. It also includes the contents of the communications and correspondence between us, whether by email, social media, or otherwise through one of our Services, through your submission of an online form and survey responses, or when you otherwise provide information to our support team or user research team, as well as your communications preferences, such as for marketing purposes. Details of our

interactions with you and the products and services you use with a view to establish relevant facts (including without limitation, any records of the phone calls between you and Bullish, emails, meeting notes, letters.

**Investment data**

which means your knowledge of and experience in investment matters, investment objectives and prior investments.

**Marketing data**

which includes your preferences in receiving marketing from us or third parties and your communication preferences

**Profile data**

which includes your username and password; your identification number as our user; requests by you for products or services; your interests, preferences and feedback; other information generated by you when you communicate with us, for example when you address a request to our customer support.

**Usage data**

which means information about how you use the Website, the Services, mobile applications and other offerings made available by us, including: – device download time, – install time, – interaction type and time, – event time, name and source.

**Online Identifying information**

which means your IP address, browser name, operating system, GUID, coarse location and fine location. When you visit our Website or access our apps, our web server automatically records details about your visit (for example, your IP address, the type of browser software used, the Bullish Website pages that you actually visit including the date and the duration of your visit). Please read our **Cookie Notice** for more information.

**Blockchain data**

such as public blockchain data in order to assess if customers using Services are not engaged in illegal or prohibited activity and/or in breach of our Terms of Use, and to analyse transaction trends for research and development purposes.

**Information provided by identity verification partners, credit reference agencies, and public databases**

which means personal information processed with our purpose to comply with our legal obligation related to anti-money laundering laws, to prevent and detect crime and for anti-fraud purposes.

We may also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but it is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

## 5. How We Use Your Personal Data

The following table outlines how and why we use your Personal Data:

Activity	Categories of Personal Data	Lawful Bases
To register you as a new customer. Enable you to use our Services and enforce our Service terms and conditions. It includes account creation	Personal Identification data; Social Identification data; Contact and Correspondence data; Financial data	Performance of a Contract
Provision of our Services to you, including to execute, manage, and process any instructions or orders you make	Personal Identification data; Contact and Correspondence data; Financial data, Transactional data, Online Identifying information; Financial data; Transactional data; Contact and Correspondence data	Performance of a contract
To provide support for our Services. Answer your queries, resolve matters with accounts, disputes, collecting fees, to troubleshoot problems and otherwise provide general support related to our Services, Identity authentication	Personal Identification data; Transaction data; Government Issued Identification data; Correspondence data; Online Identifying data	Performance of a contract Legitimate interest (to provide the activities described in the left column)
To manage our relationship with you which will include asking you to leave a review, take a survey, keeping you informed of our company's business and product development, Keeping you updated about our Services, inform	Personal Identification data; Contact and Correspondence data; Profile data; Transactional data; Marketing data.	Performance of a contract Consent, if required

you of relevant security issues or updates, or provide other transaction-related information.

Compliance with laws and regulations, including AML, Fraud, Sanctions, Terrorist Financing Regulations, Tax evasion. Verify accounts and activity, including processing personal data for identity verification purposes where required, detect abuse, fraud, money laundering, breach of confidence, theft of proprietary materials and any other illegal activities on our platforms. Such processing is necessary for us to comply with laws in the jurisdictions where we are subject to them.

Personal Identification data; Contact and Correspondence data; Transactional data; Investment data; Blockchain data; Information provided by identity verification partners, credit reference agencies, and public databases; Online Identifying information.

Legal obligation

We may process such data if it is required for the performance of the contract we have with you.

We may process this personal data for our legitimate interest in ensuring that Bullish is not involved in dealing with the proceeds of criminal, unlawful or fraudulent activities, as well as to develop, manage and improve our internal systems and controls for dealing with financial crime and to ensure effective management of complaints.

Protection of company interests, including the prevention of abuse of our Services and promotions. Protecting of the Services we provide, protection of our business interests, and protection of data

Personal Identification Information; Government Issued Identification Information; Institutional Information; Financial Information; Transaction Information; Employment information; Correspondence Information; Online Identifying Information; Application Security Information; Blockchain Data; Information provided by identity verification and KYC partners, credit reference agencies, and public databases

Legitimate interest (to provide the activities described in the left column)

<p>Obtain professional advice, obtain independent audits or similar services.</p> <p>Obtain professional services from consulting, tax, legal, audit, accounting, or other professional firms for the proper protection or functioning of our business, and proper treatment of transactions</p>	<p>Personal Identification Information; Government Issued Identification Information; Institutional Information (including group affiliation); Licence details; Membership details with professional bodies; Transaction data; Employment information; Correspondence Information; Online Identifying Information; Application Security Information; Information provided by identity verification and KYC partners, credit reference agencies, and Financial Information to a certain extent.</p>	<p>Performance of a contract</p> <p>Legitimate Interest (to provide the activities described in the left column)</p> <p>We collect these data to ensure appropriate review and related risks are considered and assessed for any outsourced service, and ensure the businesses are legitimate, competent and can provide good quality service.</p>
<p>Manage business risk.</p> <p>Mitigate risks related to the daily operations of Bullish.</p>	<p>Personal Identification Information; Government Issued Identification Information; Institutional Information; Financial Information; Transaction Information; Employment information; Correspondence Information; Online Identifying Information; Application Security Information</p>	<p>Legitimate Interest (to provide the activities described in the left column)</p>
<p>Network, information security and investigations. We process your personal information to administer and protect our Site and Services, including to improve and monitor security, combat spam, troubleshooting, testing, system, maintenance, support, reporting, hosting of data, and other malware or security concerns.</p>	<p>Transaction Information; Online Identifying Information</p>	<p>Legitimate Interest (to provide the activities described in the left column)</p>

Sharing with law enforcement/legal requests. Comply with valid legal requests from authorities, and to comply with our legal and regulatory obligations in the jurisdictions where we are subject to them.	Personal Identification Information; Government Issued Identification Information; Financial Information; Transaction Information; Employment information; Correspondence Information; Online Identifying Information; Blockchain Data; Information provided by identity verification and KYC partners, credit reference agencies, and public databases	Legal Obligation
Facilitate corporate merger and acquisitions. To enable us to initiate or conclude corporate acquisitions, mergers, or other corporate transactions.	Personal Identification Information; Government Issued Identification Information, Institutional Information, Employment information, Correspondence Information	Legitimate interests (to provide the activities described in the left column)
To properly manage, process, collect and transfer payments, fees and charges, and to collect and recover payments owed to us	Personal identification data; Bank account details; Transactional data (including wallet address if needed)); Billing details; Contact details (e.g. business or personal address, email, phone number).	Performance of a contract Legitimate Interest (to provide the activities described in the left column)
To use the services of other financial institutions, crime and fraud detection and prevention companies, risk measuring and management companies, which will use the personal data they receive for their own purposes while acting as independent data controllers	Personal Identification Information; Government Issued Identification Information; Institutional Information (including group affiliation); Licence and Regulatory details; Transaction data; Employment information; Correspondence Information; Online Identifying Information; Application Security Information; Information provided by identity verification and KYC partners, credit reference agencies, and Financial Information to a certain extent.	Performance of a contract Legitimate Interest (to provide the activities described in the left column)
Ensure quality control and staff training to make sure we continue to provide you with accurate	Personal Identification Information, Transaction Information, Correspondence Information	Legitimate Interest (to provide the activities described in the left column)



information and high-quality Services.		
Events and webinars. Facilitate Event registration, plan and execute Events, and share pre- and post-event information with registrants and interested individuals.	Personal Identification Information; Transaction Information; Employment information; Correspondence Information	Legitimate Interest (to provide the activities described in the left column)
Prizes, contests and surveys. To allow you to enter a prize drawing, contest, or complete a survey	Identity Data Contact Data Profile Data Usage Data Marketing and Communications Data	Performance of a contract Consent, if required
For research & development. We process your personal information to better understand the way you use and interact with our Services. Leveraging data analytics to improve our Website, Services, marketing, users experiences and their relationship with Bullish.	Personal Identification data Social Identification data Contact and Correspondence data Investment data Marketing data Profile data Usage data Online Identifying information	Legitimate interest (to provide the activities described in the left column)
Product/ UX user research & testing. Identify the behaviour patterns, thoughts, and needs of customers by gathering user feedback from observation, task analysis, and other methods. It also includes gathering market data for studying customers' behaviour including their preference, interest and how they use our products/services.	Personal Identification data Social Identification data Contact and Correspondence data Investment data Marketing data Profile data Usage data Online Identifying information	Consent
Marketing activities. Provide you with relevant information and news about our Services, events, promotions, prizes, giveaways and other opportunities. Send information that may be of interest to you based on your preferences.	Personal Identification Information; Correspondence Information; Online Identifying Information, Marketing Data, Profile Data	Consent Legitimate Interest(to provide the activities described in the left column)

Website traffic analysis and analytics. Understand how users interact with our Websites, analyse Website traffic and usage, to improve our Websites and our offerings	Personal Identification Information; Transaction Information; Online Identifying Information; Usage Data	Consent
Engaging with you on social media. Engaging with you on social media, including on subsections of social media platforms controlled by us. Understanding how you engage with us on social media, engaging users through social media platforms, and improving our social media activities and users' social media experience	Personal Identification Information; Correspondence Information; Online Identifying Information; Social Identification, Profile Data	Legitimate Interest (to provide the activities described in the left column) Consent
To utilise the services of social media or advertising platforms, some of which may use personal data they receive for their own purposes, including marketing purposes, determining our marketing campaigns and growing our business	Personal Identification Information; Correspondence Information; Online Identifying Information, Social Identification, Profile Data	Consent

In the above table, "consent" refers to Article 6(1)(a), "performance of a contract" to Article 6(1)(b), and "legitimate interest" to Article 6(1)(f) of the GDPR, or the equivalent provisions in your jurisdiction.

When the lawful basis for processing your Personal Data is legitimate interest, the respective legitimate interest is described in more detail in the left column of the respective row in the table. We always ensure that we consider and balance any potential impact on you and your rights under data protection laws.

We will only use your Personal Data for the purposes for which it was collected, unless we need to use it for another reasonable purpose that is compatible with the original purpose. In such cases, we will inform you about that other purpose and any other relevant information according to Article 13 and 14 GDPR, or the equivalent provision in your jurisdiction, prior to that further processing.

## 6. How We Share Your Personal Data

We may share your Personal Data with the following categories of recipients:

- Third-party service providers who need access to Personal Data to assist us in delivering Services or the operation of our business. For example, such third-parties include payment processors; information technology service providers; providers of identity verification services; Website hosting

providers; insurance, marketing, accounting, shipping, and delivery vendors; other business process outsourcing providers; and partners who assist us with administering programs we offer to you, such as our bug bounty program.

- Information provided by identity verification and KYC partners, credit reference agencies, and public databases, which means personal information processed with our purpose to comply with our legal obligation related to anti-money laundering laws, to prevent and detect crime and for anti-fraud purposes. Our ID verification partners use a mix of government records, publicly available information, information provided to us by you and the use of technology to help Bullish on your identity verification. Such information may include criminal convictions and offences, credit history, status on any sanctions lists maintained by public authorities, and other relevant data.
- Third-party service providers who need access to Personal Data to provide advertising and analytics services. For example, we use a third-party service for the collection and management of your Personal Data that enables us to deliver marketing communications about our Services and events to you.
- Public law enforcement agencies or public or judicial bodies insofar and only to the extent as we are obliged to do so by law, by court order or on the basis of an enforceable official order, to comply with our legal obligations. Bullish requires that a request from a law enforcement agency or public or judicial body having jurisdiction over us be accompanied by sufficient legal process. This varies by location. For instance, production orders, search warrants, freezing orders, seizure orders, and subpoenas, as well as requests for voluntary data disclosure, all constitute a legal process. Bullish thoroughly evaluates each order and request for voluntary disclosure to verify the existence of a legitimate legal basis and that any response is carefully limited to ensure that the requesting public law enforcement agencies or public or judicial bodies receives just the data and/or remedy to which they are entitled. Additionally, Bullish requires that requests for asset freezing and/or seizure adhere to the relevant local jurisdiction's legal process and include all appropriate instructions, including, if applicable, the period of the freeze.
- Professional advisors who provide banking, legal, compliance, insurance, accounting, or other consulting services in order to complete third party financial, technical, compliance and legal audits of our operations or otherwise comply with our legal obligations.
- Other credit and financial service institutions or comparable institutions to which we transfer your Personal Data in order to process payments you have authorized and/or to carry out a business relationship with you (depending on the contract, e.g., correspondent banks, custodian banks, brokers, stock exchanges, information offices).
- Other recipients of data can be any person for which you have given us your consent to transfer data.
- Our corporate affiliates in the Bullish Group, when necessary to complete the processing activities described above.
- Other recipient, as reasonably necessary:
  - In relation to a merger, sale, acquisition, divestiture, restructuring, reorganisation, dissolution, bankruptcy, or other change of ownership or control (whether in whole or in part); or
  - To: (i) to detect and prevent financial crime, money laundering, terrorism, and tax evasion where required by law, to comply with applicable laws, a request from a law enforcement agency, regulatory authority, public or judicial body with jurisdiction over us, or other legal process; (ii) protect our legitimate rights, privacy, property, vital interests, health and safety, as well as those of our customers, business partners, personnel, or the general public; (iii) seek

professional advice, manage risk (including obtaining and managing insurance), pursue available remedies or limit damages; (iv) enforce our rights and Terms of Use; (v) respond to an emergency; (vi) other banks to help trace money in cases of fraud or other crimes.

If we transfer Personal Data to recipients acting as processors on behalf of Bullish, it is contractually ensured that the processor will process such Personal Data exclusively on our behalf and has implemented appropriate technical and organizational measures to protect the Personal Data.

We always endeavour to only share the minimum amount of Personal Data that these third parties need to perform their tasks.

## **7. International Data Transfers**

We may transfer your Personal Data to recipients in countries outside of your jurisdiction for processing in accordance with this Privacy Notice and as permitted by the applicable laws. These locations include the European Economic Area, (EEA), United States, and Asia-Pacific region.

A transfer of Personal Data to countries outside the EEA will only take place where one of the conditions below apply:

- The European Commission has decided by way of an adequacy decision according to Article 45 GDPR that the country or the organization we are sharing your Personal Data with will protect your information adequately; or
- We have entered into the standard contractual clauses of the European Commission for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 with the recipient with which we are sharing your Personal Data to ensure your information is adequately protected.
- Other so-called suitable safeguards, according to Article 44 et seq. GDPR are in place.

If service providers contracted by us and located in a country outside the EEA need to access Personal Data (for example, in connection with IT, cloud, or hosting services), we ensure an appropriate level of data protection through careful selection of the service provider and through contractual, technical, and organizational measures.

If you would like to see the specific contractual safeguards for the transfer of Personal Data to countries outside the EEA, simply send an e-mail request to [privacy@bullish.com](mailto:privacy@bullish.com).

## **8. Third Party Applications and Websites**

Our Data Sources may contain links to third-party applications not affiliated with us. Your use of an external application or any informational content found on external applications is subject to and governed by the privacy policies, terms, and conditions of that application.

We do not endorse or make any representations or warranties concerning, and will not in any way be liable for, any informational content, products, services, software, or other materials available on external applications are framed within our Data Sources.

While we do review the privacy practices of our Service Providers prior to engaging them to ensure that they meet Bullish Service Provider privacy standards, we ultimately do not control the privacy practices of

any external applications or Websites. The Websites may contain links to Websites not affiliated with us. Your use of external Websites or any informational content found on external Websites is subject to and governed by the privacy policies, terms, and conditions of those Websites. We do not endorse or make any representations or warranties concerning, and will not in any way be liable for, any informational content, products, services, software, or other materials available on external Websites even if one or more pages of the external Websites are framed within a page of our Websites.

## **9. Advertising and Analytics Services Provided by Third Parties**

We may allow others to serve advertisements on our behalf across the Internet and to provide analytics services. These entities may use cookies, web beacons and other technologies to collect information about your use of our Data Sources and other websites, including your IP address, web browser, pages viewed, blocks created, transactions undertaken, information provided to Bullish, time spent on pages, links you clicked, and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our website, and better understand your online preferences. For more information about interest-based ads, please visit the Digital Advertising Alliance at [www.aboutads.info/choices](http://www.aboutads.info/choices).

We will get your consent before we share your personal data with any third party for marketing purposes.

The third-party service providers we use for advertising and analytics include:

- Plausible Analytics, a web analysis service that captures web analytics entirely anonymously, uses no cookies, and collects no personal data. All data is used in the aggregate only, and there is no tracking across devices, or websites. To learn more, please review the [Plausible Analytics Privacy Policy](#) and the [Plausible Analytics Data Policy](#).
- We use Piwik PRO Analytics Suite as our website/app analytics software. We collect data about website visitors based on [cookies](#). The collected information may include a visitor's IP address, operating system, browser ID, browsing activity and other information. See the scope of data collected by Piwik PRO. We calculate metrics like bounce rate, page views, sessions and the like to understand how our website/app is used. We may also create visitors' profiles based on browsing history to analyse visitor behaviour, show personalised content and run online campaigns. The data is hosted on Microsoft Azure in the Netherlands and the data is stored for 14/25 months. The purpose of data processing is the analytics and conversion tracking based on consent. Piwik PRO does not send the data about you to any other sub-processors or third parties and does not use it for its own purposes. For more, read [Piwik PRO's privacy policy](#).
- Google Tag Manager: In order to monitor and provide diagnostics about system stability, performance, and installation quality, Google Tag Manager may collect some aggregated data about tag firing..
- Google Ads & DoubleClick: Google stores a record of the ads it serves in its logs. These [server logs](#) typically include your web request, IP address, browser type, browser language, the date and time of your request, and one or more cookies that may uniquely identify your browser. Google stores this data for a number of reasons, the most important of which are to improve its services and to maintain the security of its systems. Google anonymizes this log data by removing part of the IP address (after 9 months) and cookie information (after 18 months). To help Google's partners

manage their advertising and websites, Google offers many products, including Google Ads, and a range of DoubleClick-branded services. When you visit a page or see an ad that uses one of these products, either on Google services or on other sites and apps, various cookies may be sent to your browser. These may be set from a few different domains, including google.com, doubleclick.net, googlesyndication.com, or googleadservices.com, or the domain of Google partners' sites. Some of Google's advertising products enable its partners to use other services in conjunction with Google's (like an ad measurement and reporting service), and these services may send their own cookies to your browser. These cookies will be set from their domains. See more detail about the [types of cookies used by Google](#) and Google's partners and [how they use them](#).

- X: Conversion tracking enables Bullish to measure its return on ad spend by tracking the actions people take after viewing or engaging with Bullish's ads on X. On X, Bullish can use its X Pixel or the Conversions API to set up conversion tracking. These solutions pass data back to X and help enable user attribution. It does this by matching conversion data to a X user, using available identifiers like cookie IDs, [Click ID](#) or email. The X Pixel allows Bullish to put a piece of code on the website to send conversion data to X. The Conversion API allows advertisers to send conversion data directly from a server to X. Learn more about the X Pixel, Conversions API, and other conversion tracking tools [here](#). Attributed data can be used for a variety of purposes, such as building [Website ActSivity Audiences](#) for campaign retargeting, to improve optimization models to help you drive action with your campaigns, and for reporting of campaign results, to understand the impact of a campaign. Use of any of X's conversion tracking products or services is subject to the X Conversion Tracking Program T&C's, which can be found [here](#).
- LinkedIn: The LinkedIn Insight Tag enables the collection of data regarding members' visits to Bullish's website, including the URL, referrer, IP address, device and browser characteristics (User Agent), and timestamp. LinkedIn doesn't share the personal data of members with Bullish; LinkedIn only provides reports and alerts (which do not identify members) about Bullish's website audience and ad performance. LinkedIn also provides retargeting for website visitors, enabling Bullish to show personalised ads off Bullish's website by using this data, but without identifying the member. LinkedIn also uses data that doesn't identify members to improve ad relevance and reach members across devices. LinkedIn members can control the use of their personal data for advertising purposes [through their account settings](#).
- The Trade Desk offers what is known in the industry as a Demand Side Platform. The Trade Desk provides technology that helps advertisers and their advertising agencies manage digital advertising campaigns across many channels, such as websites, apps, audio, smart TVs, and other video. The Trade Desk technology uses data to target and serve or to help Bullish to target and serve relevant advertising to consumers and to perform attribution analysis or other analytics regarding advertising audiences, as well as to compile, match and link audiences on behalf of Bullish. For instance, The Trade Desk may, or help Bullish to, use this data to: – Determine what ad to show a consumer, and customise ads to particular types of audiences; – Customise ads to the type of web page users are viewing; – Limit the number of times a consumer sees an ad or a type of ad; – Perform analysis of how effective the ads are; – Help Bullish learn more about their own consumers; – Troubleshooting; and – Fraud detection. Learn more about The Trade Desk's privacy policy [here](#).
- PubMatic, Inc., who develops and implements online advertising software and strategies for the digital publishing and advertising industry. Learn more about PubMatic's privacy policy [here](#).

- Casale Media uses cookies for the purpose of tracking when an Internet user has seen an advertisement. Learn more about Casale Media's privacy policy [here](#).

## 10. Cookies

We use Cookies, web beacons, and other data collecting technologies, such as when you navigate the website or click on links in the emails we send you. A cookie is a small data file that is transferred to a web browser, allowing our Sites to remember and customize your subsequent visits. A web beacon (also called a "pixel tag" or "clear GIF") is a piece of computer code that enables us to monitor user activity and website traffic. To learn more about how we use cookies then please visit our [Cookie Notice](#). For more information on cookies and web beacons more generally, please visit [AllAboutCookies.org](#). Some web browsers offer settings that allow you to reject cookies or alert you when a cookie is placed on your computer or device. Please note that if you reject cookies, the functionality of some areas of the website may be limited.

You have the option to manage cookies placed by our website on an ongoing basis by opting out of any Cookies category except Strictly Necessary Cookies by changing your Cookies Settings using our cookie preference manager found in the [Cookie Notice](#) that you may access by clicking on "Customize Settings" in our Cookie Notice. Please note that if you reject cookies, the functionality of some areas of the website may be limited.

## 11. Automated Decision-Making and Profiling

Automated decision-making is a process by which your Personal Data is used to make a decision about you that creates legal or other significant effects in an automated fashion using an algorithm alone, without any human intervention in the process. Profiling is where Personal Data is evaluated in an effort to predict things like interests or preferences about what types of information an individual might want to receive. Although profiling is a type of automated processing, it does not produce legal (or other significant) effects and in that way is different from automated decision-making.

As discussed above in the section on "Advertising and Analytics Services Provided by Third Parties", we may use profiling as part of our analytics to deliver the most relevant content and best experience to you

Bullish relies on automated tools to help determine whether a transaction or a customer account presents a fraud or legal risk. Under the GDPR, you have the right not to be subject to a decision based solely on automated processing of your Personal Data, including profiling, which produces legal or similarly significant effects on you, save for the exceptions provided for in Article 22 GDPR (e.g. if the automated processing including profiling is based on the data subject's explicit consent).

Customers won't be subject to decisions that will have a significant impact on them based solely on automated decision-making. In cases where a customer does not pass our KYC verification, they will be immediately provided with an option to contact customer support and initiate a manual process to review the automated decision-making. Transaction monitoring will also be automated, with alerts and escalations being manually investigated by our Compliance team.

You have the right to not be subject to a decision based solely on automated processing.

## 12. Your Rights

Applicable privacy legislation may entitle you to some or all of the following rights with respect to your Personal Data:

- **To access the Personal Data we maintain about you (Article 15 GDPR).** You have the right to obtain information from us about your Personal Data that is processed by us. For example, you may request information about the purposes of the processing, the category of the Personal Data, the recipients or

categories of recipients to whom the Personal Data has been or will be disclosed, the envisaged storage period or the criteria to determine that period, as well as the existence of a right to rectification, erasure, restriction of the processing or to object. We will provide you with one copy of your Personal Data free of charge, but we may charge you a reasonable fee to cover our administrative costs if you request further copies of the same information.

- **To correct your Personal Data (Article 16 GDPR).** You have the right to ask us to rectify Personal Data you think is inaccurate or incomplete. In some cases, you will need to make these changes yourself by using the tools we provide in the Data Sources.
- **To have your Personal Data erased (Article 17 GDPR).** You have the right to ask us to delete your Personal Data. In some cases, you will need to do the deletion yourself using the tools we provide in the Data Sources. If we have shared your Personal Data with a third party in the manner described above, we will require the third party to delete the Personal Data that we have shared with them (consistent with their legal obligations to do so). We will decline your request for deletion if processing your Personal Data is necessary: (i) to comply with our legal obligations such as fraud detection and monitoring, (ii) or being required to perform a task in the public interest; (iii) in pursuit of a legal action; (iv) for exercising the right of freedom of expression and information; and (v) for archiving purposes in the public interest, scientific research historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of that processing.
- **To restrict how we process your Personal Data.** At your request, we will limit the processing of your Personal Data if:
  - you dispute the accuracy of your Personal Data;
  - your Personal Data was processed unlawfully, and you request a limitation on processing, rather than the deletion of your Personal Data;
  - we no longer need to process your Personal Data, but you require your Personal Data in connection with a legal claim; or
  - you object to the processing and no overriding legitimate interest for the processing exists.
- **The right to data portability (Article 20 GDPR).** You have the right to receive your Personal Data in a structured, commonly used and machine-readable format, and to have us transfer your personal information to another controller. Please note information may already be available to you via the Data Sources.
- **To object to how we process your Personal Data (Article 21 GDPR).** Where we process your Personal Data based on our legitimate interest (or that of a third party), you have the right to object to this processing on grounds relating to your particular situation if you feel it impacts on your fundamental rights and freedoms. We will decline your request where we have compelling legitimate grounds for the processing which override your rights and freedoms, or where the processing is in connection with the establishment, exercise or defence of legal claims.
- **To stop your Personal Data from being used for direct marketing purposes (Article 21 GDPR).** At your request, we will stop using your Personal Data for the purpose of direct marketing. Our marketing communications include an unsubscribe facility, which we encourage you to use. If you want to stop us from contacting you in connection with marketing communications, please email us at the email address specified below.
- **Not to be subjected to automated decision making (Article 22).** In some jurisdictions, you have the right not to be subject to a decision based solely on automated processing of your personal



information, including profiling, which produces legal or similarly significant effects on you, save for the exceptions applicable under relevant data protection laws.

- **To withdraw any consent that you gave us to process your Personal Data (Article 7(3) GDPR).** You have the right to withdraw any consent you may have previously given us at any time. Your consent withdrawal will not affect the lawfulness of the processing done before the withdrawal.
- **To complain to a supervisory authority (Article 77 GDPR).** If you are not satisfied with our response, you have the right to complain to or seek advice from a supervisory authority and/or bring a claim against us in any court of competent jurisdiction. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority, so please contact us in the first instance.

To exercise the above rights, please complete a [Data Subject Rights Request Form](#) or contact us at [privacy@bullish.com](mailto:privacy@bullish.com). We will consider and process your request within the required period of time. Please be aware that under certain circumstances, or in relation to certain types of data, the applicable legislation may limit your exercise of these rights.

Please note that in some cases, if you do not agree with the way we process your information, it may not be possible for us to continue to operate your account and/or provide certain products and services to you.

It is our policy to respect the rights of individuals. However, please be aware that your exercise of these rights may be subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime); where an overriding legitimate interest for the processing exists (e.g. the maintenance of legal privilege) and; some of these rights may be limited (for example, the right to withdraw consent) where we are required or permitted by law to continue processing your personal data to establish, exercise, and defend our legal rights or meet our legal and regulatory obligations; and for the protection of the rights of another natural or legal person.

### 13. How long we keep your information

We retain Personal Data for the period of time necessary to fulfil the purposes outlined in this Privacy Notice unless a longer retention period is required by law. To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

Retention periods may be changed from time to time based on business or legal and regulatory requirements.

We may on exception retain your information for longer periods, particularly where we need to withhold destruction or disposal based on an order from the courts or an investigation by law enforcement agencies or our regulators. This is intended to make sure that the bank will be able to produce records as evidence, if needed.

While retention requirements vary by jurisdiction, information about our typical retention periods for different aspects of your personal information are described below:

- Personal Data collected to comply with our legal obligations under financial or anti-money laundering laws may be retained after account closure for at least five years.

- Contact Information such as your name, email address and telephone number for marketing purposes to those who subscribe to our newsletter is retained for 6 months or until you unsubscribe. Thereafter we will add your details to our suppression list to ensure we do not inadvertently market to you.
- Personal Data relating to customer complaints, including contact information, complaint information, information needed to resolve a complaint, and linkages to account information as necessary to resolve complaints may be retained for six years after account closure.
- Personal Data relating to trades or other financial transactions made on the Bullish exchange, including personal identifiers needed to link transactions with individuals may be retained after the account closure for at least seven years.
- Personal Data provided by an individual when opening an account on Bullish, but prior to proceeding through the KYC process is retained for at least three years. This information can include email address, location of residence, and other basic identifying information.
- Personal Data collected via technical means such as cookies, web page counters and other analytics tools is kept for a period of up to one year from expiry of the cookie.

Longer retention period than those stated above may apply if required by applicable law.

If you would like more information about how long we keep your information, please contact us at [\*\*privacy@bullish.com\*\*](mailto:privacy@bullish.com).

#### **14. Data Security**

We have a significant investment in cyber security controls, including, but not limited to in-house and external expertise, state-of-the art technologies, and processes. We follow a security by design approach, strengthened by continuous vulnerability and threat management, regular penetration testing, a bug bounty program, and ongoing security monitoring and risk management practices.

You can find more information about our security practices on [\*\*https://bullish.com/bullish-on-security/\*\*](https://bullish.com/bullish-on-security/).

Procedures have been put in place to deal with any suspected breach of personal information. We will notify you and any applicable regulator of a data breach when we are legally required to do so.

#### **15. Marketing**

You can opt-out of receiving marketing communications from us at any time by clicking the unsubscribe link at the bottom of a marketing email. In addition, you can notify us directly via email at [\*\*privacy@bullish.com\*\*](mailto:privacy@bullish.com) if you prefer not to receive any marketing messages. If you opt out of receiving marketing communications, that will not apply to service and transactional messages such as emails related to maintenance and changes to the terms and conditions.

## 16. Children's Privacy

Bullish Services are directed at adults aged 18 years and over, and not intended for children. We do not market to and do not knowingly collect Personal Data from individuals under the age of 18. Our verification process prevents Bullish collecting data of minors. Please contact us at [privacy@bullish.com](mailto:privacy@bullish.com) if you believe any individual under the age of 18 is using our Services so we can take immediate action to prevent his or her access to our Services and delete the information as soon as possible.

## 17. Do Not Track

Certain web browsers and other devices may permit you to submit your preference for not being "tracked" online, also known as "Do Not Track" or "DNT" signals. Since uniform standards for DNT signals have not been adopted, we do not currently process or respond to "DNT" signals. We will make efforts to monitor developments around "do not track" browser technology and the implementation of a standard.

## 18. Obligation to Provide Personal Data

In principle, you are not obliged to provide us with your Personal Data. However, if you do not do so, we may not be able to make our Websites or Services available to you without restriction or answer your inquiries to us. Personal Data that we do not necessarily require for the processing purposes stated in this Privacy Notice are marked accordingly as voluntary information.

## 19. Updates to the Privacy Notice

To keep up with changing legislation, best practices and changes in how we process your personal data, we reserve the right to revise this Privacy Notice at any time and without notice by posting an updated version on this Website. To stay up to date on any changes, we would therefore encourage you to review this Privacy Notice regularly to stay informed of the purposes for which we process your Personal Data and your rights to control how we process it. To the extent permitted by law, by continuing to use our Data Sources after changes have been posted, you are confirming that you have read and understood the latest version of this Privacy Notice.

If you have any questions, comments or complaints, or would like to exercise your rights concerning your Personal Data and privacy preferences, you may use self-service options if they are available to you or contact in the following ways

- Submit a request through the [Bullish Data Subject Rights Request web form](#).
- Contact us directly at [privacy@bullish.com](mailto:privacy@bullish.com).