

## PRIVACY POLICY

Last Modified: January 10, 2023

BTCS Inc., a Nevada corporation (“**Corporation**”, “**we**”, “**us**”, or “**our**”) respects your privacy and is committed to protecting it through our compliance with this privacy policy. This privacy policy will inform you as to how we treat your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy describes the types of information we may collect from you or that you may provide when you visit the website <https://www.btcs.com> (the “**Corporate Site**”) including any of our Social Media Pages as defined therein, as well as <https://www.stakeseeker.com> (the “**Platform Informational Site**”), and our “**Digital Asset Platform**” available at <https://www.my.stakeseeker.com> (the “**Platform Site**,” together with the Corporate Site, each Social Media Page, and the Platform Informational Site, collectively, the “**Website**”), and our practices for collecting, using, maintaining, protecting, and disclosing that information. Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using the Website, you agree to this privacy policy. This policy may change from time to time (see “**Changes to this Privacy Policy**” below). Your continued use of the Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

This policy applies to information we collect:

- on the Website;
- in email, text, and other electronic messages between you and the Website; or
- when you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- us offline or through any other means, including on any other website operated by the Corporation or any third party (including our affiliates); or
- any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website.

### **Purpose of this Privacy Policy**

This privacy policy aims to give you information on how we collect and process your personal data through your use of the Website, including any data you may provide through the Website when you purchase, access or use any of our products/services.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

## **Controller**

BTCS, Inc. is the controller and responsible for your personal data. We have appointed a Data Privacy Manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the Data Privacy Manager at the email address below.

[support@stakeseeker.com](mailto:support@stakeseeker.com)

## **Collection of Information**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include information where the identity has been removed (anonymous data) or is otherwise subject to an exemption under applicable law including with respect to applicable business to business communications.

We may collect, use, store, and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier (including usernames and passwords necessary to gain application programming interface (API) access to your third-party hosted cryptocurrency exchange accounts and cryptocurrency digital wallets for the purpose of aggregating such information on the Platform), marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account, payment card details, transaction history, trading data, tax identification, cryptocurrency exchange accounts, and cryptocurrency digital wallets.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, public addresses or public keys, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Website.
- **Profile Data** includes your username and password, staked cryptos, trade data, your interests, preferences, feedback, and survey responses.

- **Usage Data** includes information about how you use our Website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also may collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data by law as this data will **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 policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric data). Nor do we collect any information about criminal convictions and offenses.

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by postal mail, phone, email or otherwise. This includes personal data you may provide when you:
  - subscribe to our publications;
  - request marketing to be sent to you;
  - create an account on our Website;
  - inquire about or place an order for our products; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our Website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, web beacons, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. See our section on Cookies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:
  - Technical Data about you from analytics providers or search information providers;
  - Contact, Financial, and Transaction Data from providers of technical, payment, and delivery services; or
  - **Google Analytics.** We may use Google Analytics, a web analysis service provided by Google, in order to better understand your use of our Website and how we can improve it. Google Analytics collects information such as how often users visit a website, what pages you visit when you do so, and

what other websites you used prior to coming to such website. Google Analytics collects only the IP address assigned to you on the date you visit a website, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with your personal information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit a website, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to the Website is restricted by the Google Analytics Terms of Use and the Google Privacy Notice. Google utilizes the data collected to track and examine the use of the Website, to prepare reports on its activities and share them with other Google services. Google may use the data collected on the Website to contextualize and personalize the ads of its own advertising network. To more fully understand how Google may use the data it collects on the Website please review "How Google uses information from sites or apps that use our services" (located here <https://policies.google.com/technologies/partner-sites?hl=en-US> or any successor URL); or

• **Public Databases, Credit Bureaus and Identification Verification Partners.** We may obtain information about you from public databases and identification verification partners for purposes of verifying your identity in accordance with applicable law. Identification verification services such as idPal use a combination of government records and publicly available information about you to verify your identity. Such information may include your name, address, job role, public employment profile, credit history, status on any sanctions lists maintained by public authorities, and other relevant data. We obtain such information to comply with our legal obligations, such as anti-money laundering laws. In some instances, we may process additional data about you to assess risk and ensure our products and services are not used fraudulently or for other illicit activities. In such instances, processing is necessary for us to continue to perform our contractual obligations with you and others. idPal's Privacy Policy, available at <https://www.id-pal.com/data-protection-notice/>, describes their collection and use of personal data.

• **Blockchain Data.** We may analyze public blockchain data to ensure parties utilizing our products and services are not engaged in illegal or prohibited activity under our Terms of Use, and to analyze transaction trends for research and development purposes.

Please rest assured that the Corporate Website will only collect personal information that you knowingly and willingly provide by way of completed forms and emails, or information about the type of browser, IP address, or type of operating system you are using to assist us in providing and maintaining superior quality service. It is the intent of the Corporate Website to

use personal information only for the purpose for which it was requested and any additional uses specifically provided on the Website.

It is highly recommended and suggested that you review the privacy policies and statements of any website you choose to use or frequent as a means to better understand the way in which other websites garner, make use of, and share information collected.

### **Use of Information Collected**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal basis we are relying on to process your personal data where more than one basis has been set out in the table below. Generally, we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to marketing at any time by contacting us.

<b>PURPOSE/ACTIVITY</b>	<b>TYPE OF DATA</b>	<b>LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST</b>
To register you as a new contact, customer, or partner of the Corporation	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to keep our records updated and to grow our business)

<p>To process and deliver our products and services including:</p> <ul style="list-style-type: none"> <li>(a) Manage payments, fees, and charges</li> <li>(b) Collect and recover money owed to us</li> <li>(c) Gain API access to your third-party hosted cryptocurrency exchange accounts and cryptocurrency digital wallets for the purpose of aggregating such information on the Platform</li> </ul>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Financial</li> <li>(d) Transaction</li> <li>(e) Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with you</li> <li>(b) Necessary for our legitimate interests (to recover debts due to us)</li> </ul>
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> <li>(a) Notifying you about changes to our terms or privacy policy(ies)</li> <li>(b) Asking you to leave a review or take a survey</li> </ul>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> </ul>	<ul style="list-style-type: none"> <li>(a) Necessary to comply with a legal obligation</li> <li>(b) Necessary for our legitimate business interests (to keep our records updated and to study how customers use our products)</li> </ul>
<p>To administer and protect our business and this Website (including to maintain legal and regulatory compliance, to detect and prevent fraud and/or funds loss, troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data)</p>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Technical</li> </ul>	<ul style="list-style-type: none"> <li>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise)</li> <li>(b) Necessary to comply with a legal obligation</li> </ul>
<p>To deliver relevant Website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Usage</li> <li>(d) Marketing and Communications</li> <li>(e) Technical</li> <li>(f) Profile</li> </ul>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>

<p>To use data analytics to improve our Website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage (c) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to define types of customers for our products, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

**Promotional Offers from Us**

At times, we may find it necessary to use personal data as a means to keep you informed of other possible products and/or services that may be available to you from the Website. We may also be in contact with you with regard to completing surveys and/or research questionnaires related to your opinion of current or potential future products and/or services that may be offered. You will receive marketing communications from us if you have requested information from us or purchased goods from us and you have not opted out of receiving that marketing, or if you have opted in to our marketing program. See our section on Unsubscribe or Opt-Out for more details.

**Sweepstakes, Contests, Giveaways, Raffles or Similar Promotions**

We may operate sweepstakes, contests, giveaways, raffles and similar promotions through the Website or our affiliates’ websites, including with respect to any links or landing pages related thereto that may require online registration by and among us, our affiliates, third parties, or vendors. We typically ask you for certain personally identifiable information when you enter and, if applicable, win a sweepstake, contest, giveaway, raffle or similar promotion. We may share this personally identifiable information with our affiliates, or other third-parties, including, but not limited to, sponsors, co-sponsors, marketing parties, or prize providers of such sweepstakes, contests, giveaways, raffles and promotions (irrespective of whether it is hosted by us), or otherwise in accordance with the rules applicable to such sweepstakes, contests, giveaways, raffles or promotions. You should carefully review the rules of each sweepstake, contest, giveaway, raffle and promotion in which you participate through the Website or our affiliates’ websites, as they may contain additional important information about us, or other third-parties’, including, but not limited to, sponsors’, co-sponsors’, marketing parties’, or prize providers’ use of your personally identifiable information. Insofar as the terms and conditions of

such rules concerning the treatment of your personally identifiable information conflict with this privacy policy, the terms and conditions of such rules shall control. We are not responsible for the terms and conditions of a third-party's, including, but not limited to, sponsor's, co-sponsor's, marketing party's, or prize provider participant's privacy policy.

### **Promotional Emails During Sweepstakes, Contests, Giveaways, Raffles or Similar Promotions Registration Process**

Through the Corporation, you can request to receive promotional emails from us. We may also ask if you want to receive such promotional emails from us during sweepstakes, contests, giveaways, raffles or similar promotional registration processes. If you want to receive our promotional emails, you will be asked to provide certain personal information and areas of interest so that we can fulfill your request. If you would like to stop receiving such promotional emails, please refer to the unsubscribe or opt-out provisions within the privacy policy and any emails received by you.

### **Third-Party Marketing**

The Corporation does not now sell, rent or lease any of our customer lists and/or names to any third parties.

### **Disclosures of Your Personal Data**

We may find it beneficial to share specific data with our trusted partners or our payment processing vendors, in an effort to conduct statistical analysis, provide you with email, text messages and/or postal mail, deliver support, to verify your identity, work with our service providers who help with certain parts of our business operations, fill orders and/or arrange for deliveries to be made, or otherwise for the purposes set out in the table above. Any third parties shall be strictly prohibited from making use of your personal data, other than to deliver those services which you requested, and as such they are thus required, in accordance with this privacy policy, to maintain the strictest of confidentiality with regards to all your information. We may share your personal data with **Internal Third Parties** (as set out in the Glossary) or **External Third Parties** (as set out in the Glossary).

We may deem it necessary to follow websites and/or pages that our users may frequent in an effort to glean what types of services and/or products may be the most popular to customers or the general public.

We may disclose your personal information, without prior notice to you, only if required to do so in accordance with applicable laws and/or in a good faith belief that such action is deemed necessary or is required in an effort to:



- Remain in conformance with any decrees, laws, and/or statutes or in an effort to comply with any process which may be served upon us and/or our Website;
- Maintain, safeguard and/or preserve all the rights and/or property of the Corporation; and
- Perform under demanding conditions in an effort to safeguard the personal safety of users of the Website.

We may also disclose your personal information to third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with applicable law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Change of Purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **International Transfers of Data from the European Union**

The Corporation has its headquarters in the United States. Information we collect from you will be processed in the United States. The Corporation has not sought or received a finding of “adequacy” from the European Union under Article 45 of the General Data Protection Regulation (“**GDPR**”). The Corporation relies on certain derogations for specific situations as set forth in Article 49 of the GDPR. In particular, we collect and transfer to the United States personal data only: with your consent, to perform a contract with you, or to fulfill a compelling legitimate interest of the Corporation that does not outweigh your rights and freedoms. We endeavor to apply suitable safeguards to protect the privacy and security of your personal data and to use it only consistent with your relationship with the Corporation and the practices described in this privacy policy. We may also enter into data processing agreements and model clauses with our vendors whenever feasible and appropriate.

## **If You Fail to Provide Personal Data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## **Cookies**

Please note that certain information about your computer hardware and software and browsing actions and patterns may be collected by the Corporation through automatic data collection technologies as you navigate through and interact with our Website. This information is used by us for operation of our Website and our business, to maintain quality of the Website and our business, and to provide general statistics regarding use of the Website. The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** Unless you have adjusted your browser settings so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website. Please review the “**Cookies**” section and specifically the “**Use of Cookies**” subsection below for more information on cookies and how you can manage your cookies settings.
- **Flash cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see the “**Choices About How We Use and Disclose Your Information**” subsection below.
- **Web Beacons.** Pages of the Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related Website statistics (for example, recording the popularity of certain Website content and verifying system and server integrity).

## **Use of Cookies**

The Website uses “cookies” to help personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the web server that you have returned to a specific page. For example, if you visit certain Website pages, a cookie helps us to recall your specific information on subsequent visits. When you return to the Website, the information you previously provided can be retrieved.

Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. Please see the “**Choices About How We Use and Disclose Your Information**” subsection below for more information about managing your computer’s settings for cookies.

### **Third-Party Use of Cookies and Other Tracking Technologies**

Some content or applications on the Website are served by third parties, including servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties’ tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see the “**Choices About How We Use and Disclose Your Information**” subsection below.

### **Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the personal information you provide to us. Certain mechanisms are available to you on your browser settings that provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. To learn how you can manage your Flash cookies settings, visit the Flash player settings page on Adobe’s website. If you disable or refuse cookies, please note that some parts of the Website may become inaccessible or not function properly. For more information about the cookies we use, please see our section on “**Cookies.**”

- **Promotional Offers from Us.** If we have sent you a promotional email, you may click on the unsubscribe link at the bottom of the email to be omitted from future email distributions.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative (“NAI”) on NAI’s website.

### **Accessing and Correcting Your Information**

You may send us an email at [support@stakeseeker.com](mailto:support@stakeseeker.com) to request access to, correct, or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

Residents of certain states, such as California, Nevada, Colorado, Virginia, and Utah may have additional personal information rights and choices.

Please see the “**Your State Privacy Rights**” subsection below for more information.

### **Your State Privacy Rights**

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information. To learn more about California residents’ privacy rights, visit [Privacy Notice for California Residents](#).

Colorado, Connecticut, Virginia, and Utah each provide their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales.

Colorado, Connecticut, and Virginia also provide their state residents with rights to:

- Correct inaccuracies in their personal information, taking into account the information's natural processing purpose.
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights please send an email to [support@stakeseeker.com](mailto:support@stakeseeker.com).

To appeal a decision regarding a consumer rights request please send an email to [support@stakeseeker.com](mailto:support@stakeseeker.com) stating the reasons with reasonable detail for such appeal.

Nevada provides its residents with a limited right to opt-out of certain personal information sales. Residents who wish to exercise their sale opt-out rights may submit a request to this designated address: [support@stakeseeker.com](mailto:support@stakeseeker.com). However, please know we do not currently sell data triggering that statute's opt-out requirements.

### **Children Under the Age of 18**

Our Website is not intended for children under eighteen (18) years of age. No one under age eighteen (18) may provide any personal information to or on the Website. If you are under eighteen (18), do not use or provide any information on this Website or through any of its features, make any purchases through the Website, use any of the interactive or public comment features, if any, of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use.

**The Corporation does not knowingly collect personal data from children under the age of eighteen (18)** without verifiable parental consent. If it is determined that such information has been inadvertently collected on anyone under the age of eighteen (18), we will immediately take the necessary steps to ensure that such information is deleted from our system's database.

### **Unsubscribe or Opt-Out**

All users and/or visitors to our Website have the option to discontinue receiving communications from us and/or reserve the right to discontinue receiving communications by way of email, text messages, or newsletters. You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you. If you wish to unsubscribe or opt-out from any third party websites, you must go to that specific website to unsubscribe and/or opt-out.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase or other transactions.

### **Links to Other Web Sites**

Our Website may contain links to affiliate and other third-party websites. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. The Corporation does not control, claim, nor accept responsibility for any privacy policies, practices, and/or procedures of other such websites. Therefore, we encourage all users and visitors to be aware when they leave our Website and to read the privacy statements/policy of each and every website you visit.

### **Data Security**

The Corporation has put in place appropriate security measures and shall take reasonable precautions to maintain adequate physical, procedural, and technical security with respect to our

information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of the user's personal information under our control. In addition, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We also use Secure Socket Layer (SSL) for authentication and private communications in an effort to build users' trust and confidence in the internet and Website use by providing simple and secure access and communication of personal information. Further, we may use payment processing companies based in the United States who provide credit card processing services.

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

The safety and security of your information also depends on you. If, when and where we may give you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information, to the extent possible, in public areas of the Website. The information you share in public areas may be viewed by any user of the Website.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

## **Data Retention**

We will only retain your personal data for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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 unauthorized 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.

## **Your Legal Rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data, including the rights to:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

If you wish to exercise any of the rights set out above, please contact us as set forth below in “**How to Contact Us.**”

### **No Fee Usually Required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What We May Need from You**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time Limit to Respond**

We try to respond to all legitimate requests within forty-five (45) days. Occasionally it could take us longer than forty-five (45) days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **Changes to this Privacy Policy**

We reserve the right to update and/or change the terms of our privacy policy, and as such we will post those changes to our Website homepage at <https://www.btc.com>, so that our users and/or visitors are always aware of the type of information we collect, how it will be used, and under what circumstances, if any, we may disclose such information. If at any point in time we decide to make use of any personal data on file in a manner vastly different from that which was stated when this information was initially collected, the user or users shall be promptly notified by

email. Users at that time shall have the option as to whether or not to permit the use of their information in this separate manner. We keep our privacy policy under regular review.

### **Accessing and Correcting Your Information**

You can review and change your personal information by sending us an email at [support@stakeseeker.com](mailto:support@stakeseeker.com) to request access to, correct, or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect. Proper access and use of information provided on the Website is governed by our [Terms of Use](#).

### **Your Duty to Inform Us of Changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Acceptance of Terms**

Through the use of the Website, you are hereby accepting the terms and conditions stipulated within this privacy policy. If you are not in agreement with our terms and conditions, then you should refrain from further use of our Website. In addition, your continued use of our Website following the posting of any updates or changes to our terms and conditions shall mean that you are in agreement and have accepted such changes.

### **How to Contact Us**

If you have any questions or concerns regarding this privacy policy or our privacy practices, please feel free to contact our Data Privacy Manager at the following email:

**Email address:** [support@stakeseeker.com](mailto:support@stakeseeker.com)

### **Glossary**

#### **Lawful Basis**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further



information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

### **Third Parties**

**Internal Third Parties** mean other companies in our Corporation group acting as joint controllers or processors and who are based in the United States and provide IT and system administration services and undertake reporting.

### **External Third Parties mean:**

- Service providers acting as processors based in the United States who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors, and insurers based in the United States who provide consultancy, banking, legal, insurance, and accounting services.
- Marketing providers, including public relations specialists, advertisers, and sales.
- Payment processing companies based in the United States who provide credit card processing services.

### **Your Legal Rights**

You have the right to:

#### **Request access to your personal data (commonly known as a “data subject access request”)**

This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

#### **Request correction of the personal data that we hold about you**

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

#### **Request erasure of your personal data**

This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

### **Object to processing of your personal data**

In cases where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information, which override your rights and freedoms.

### **Request restriction of processing of your personal data**

This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise, or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

### **Request the transfer of your personal data to you or to a third party**

We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information that you initially provided consent for us to use or where we used the information to perform a contract with you.

### **Withdraw consent**

At any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.