



## Data Protection Policy

"Digital Platform" LLC (Bitcredit)

Version 1.0

The purpose of this document is to explain how your personal data is processed, what measures we take to ensure data security, and also provide you with information about your rights.

More specific terms of data processing may also be provided in separate agreement(s), other service-related documentation and/or on our websites.

### Company Information

"Digital Platform" LLC - *a limited liability company established under Georgian legislation, ID code: 405449625, registered address: Georgia, Tbilisi, Vake district, Ilia Chavchavadze Ave., N29, a lending entity registered by the National Bank, with registration number 636-0120268,*

(hereinafter referred to as "**Bitcredit**", "**we**", "**our**").

### Document Objectives

- For Bitcredit clients (including potential, existing and/or former);
- For client's legal representatives or contact persons;
- For any person who contacts us and expresses interest in specific products or services;
- For any other person with whom Bitcredit has no direct connection, but whose information processing is necessary for business operations or improving our products.

### Grounds for Processing Personal Data

The basis for processing your data by us is:

- Your voluntary consent to data processing;
- Obligations under legislation;
- Necessity of data protection for concluding a contract with you or fulfilling an existing contract;
- Need for data processing to provide services / review applications;
- Necessity of data processing to protect legitimate interests of Bitcredit or third parties;
- Public availability of data;
- Video surveillance system is used for crime prevention, detection, personal security and property protection, as well as protection of confidential information.

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- We process special category data only with your written consent, while in case of biometric data - data processing occurs if it is necessary for carrying out activities for the purpose of personal security and property protection, as well as to prevent disclosure of confidential information.

### **Collection of Client Data**

Our sources for obtaining your data are:

- Your request for services and products (including telephone communication, electronic requests and/or branch visits);
- Your use of our services/products;
- Use of our remote channels;
- Your use of our official website and its functionalities (such as chat);
- We also receive information about you from public sources and third parties, when there is a legal basis and if necessary, based on your consent (for example, Credit Information Bureau, Revenue Service, Public Service Development Agency, our group companies and others).

#### **1. Processing of Client Information**

Based on the nature of the relationship with the client during service provision, the information processed by us may include data from the listed categories in proportion to their processing purpose:

#### **2. Identification Data**

Name, surname, date of birth, personal number, ID and/or citizenship document details, gender, citizenship, place of birth, address (registered and actual), nationality, photograph, signature specimen and others;

#### **3. Documentary**

ID card, passport, driver's license, birth certificate, certificate of compatriot living abroad, residence permit, temporary identification card, extract from the National Agency of Public Registry's Register of Entrepreneurs and Non-entrepreneurial Legal Entities, neutral certificate or neutral travel document number, taxpayer identification number, document confirming power of representation and others;

#### **4. Contact Information**

Address (legal and actual), email, phone number and others;

#### **5. Socio-demographic Information**

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Information about employment/profession, citizenship, education, as well as information about social status and income, and others;

#### **6. Family status, information about family members**

Marriage certificate, identification and documentary data of family members, information about family members, contact persons, information about person's death and death certificate, etc.;

#### **7. Financial information**

Information about economic and financial status, transaction and account-related information, credit history and creditworthiness, information about late payments, financial products, income, property, completed payments and/or transfers (including where and when specific transactions were made);

#### **8. Contractual information**

Information about services provided and products delivered by "Bitcredit";

#### **9. Special category data**

Information about health condition, administrative detention, criminal record, charges. Also, genetic and biometric data, etc.;

#### **10. Device Technology Data**

IP address, cookies, IMEI code, application logs, behavioral data, location information, etc.

#### **11. Records**

Audio and video recordings;

#### **12. Data Obtained Through Communication**

Data obtained through email, telephone, chat, social media, or other communication channels;

#### **13. Public Data**

Information obtained from public sources.

#### **14. Data Created by Us**

Data created by Bitcredit as a result of analyzing customer data (for example, data about customer behavior, preferences, risk rating, etc.);

#### **15. Data That Bitcredit Is Required to Process by Law**

Data that we are required to process by law (for example, data processed for identification - verification, KYC, AML purposes) etc.



## 16. Cookies

We strive to continuously improve the quality of service and experience while protecting your security when you visit our website. Accordingly, when using our website and other remote platforms, we collect cookies about you. Cookies are used to personalize, improve, and protect the security of your experience when using the website and other remote platforms. Specifically, for simplifying navigation, offering information in desired formats, improving search parameters, secure user authorization, marketing, website design optimization, and better adaptation for users.

Through cookies, we determine the operating system version, device model and other unique device identifiers, duration of time spent on websites, information about opened pages, online navigation history, browser information, information about actions performed on our website, from which geolocation you accessed, and in which language you viewed the information. We try to understand how you use our website. When visiting our website and remote channels, you have the option to accept/decline the use of cookies and/or manage the purpose of cookie usage according to your preferences (for example, you can decline the use of cookies for analytical and/or marketing purposes).

## 17. Security of your data when using the application

To improve service, Bitcredit is authorized to monitor client behavior when using digital channels. Monitoring does not involve collecting or otherwise processing personal/confidential/commercial information. The purpose of monitoring is not to analyze identified user behavior, but to study their general activity.

### Purpose of Data Processing

We process your data only for legitimate purposes and in corresponding volumes. Bitcredit may process data for various purposes, including:

- To provide Bitcredit services (including loan issuance (payment, transfer, etc.));
- To offer and improve Bitcredit services (changes in terms, new or additional products), which includes analysis of credit and/or transaction history, statistical data analysis, and more;
- To make data accessible to regulators or other supervisory bodies and audit companies in cases and procedures established by law;
- To prepare various reports, studies, and/or presentations;
- To ensure data security;
- To fulfill our legal obligations, which includes prevention, detection, and suppression of fraud, money laundering, or other crimes;
- To protect Bitcredit's or other persons' security and property;
- To send/deliver appropriate correspondence/notifications to the client;

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- For Bitcredit to fully and properly fulfill contractual obligations and/or monitor the client's fulfillment of contractual obligations;
- For marketing purposes, which involves periodic offering of various products/services by Bitcredit with the data subject's consent, development/planning of marketing activities;
- To protect Bitcredit's legitimate interests and/or legal rights.

### **Processing personal data for direct marketing purposes**

We also use your personal data for marketing purposes - we need to know them in order to provide you with tailored information about products and offers.

We collect your data from the information you share with us, as well as from sources we have access to when you use our services.

We study your data to understand what you want or need, what would be interesting for you. This is how we decide which product, service or offer might be suitable for you.

We only use your personal data and send you marketing messages when we have your consent or legitimate interest. You have the right to contact us at any time and ask us to stop sending marketing messages. We respect your wishes and will stop using your data for direct marketing purposes within maximum 3 days.

Your security and interests are important to us, which is why you will in any case receive notifications about changes we make to the terms of products and services offered to you.

In order for "Bitcredit" to fulfill its legal obligations, protect legitimate interests, and fully and properly provide services to you, depending on the context and purposes of data processing, "Bitcredit" may receive and/or transfer (make available) information about you to the following categories of third parties, including but not limited to:

- Your representative/legal representative;
- Parties involved in the transaction;
- Bodies defined by legislation;
- Credit information bureau;
- Insurance companies;
- Service providers - including but not limited to: Bitcredit's external auditors, consultants, advisors, courier and/or research organizations, IT service providers (for example cloud infrastructure services), and/or any other persons with similar functions.
- Other financial organizations (for example correspondent banks, intermediary banks for international transfers, investors, Visa, Mastercard, etc.);

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- Our group companies.
- Other third parties with your consent.
- "Digital Platform" LLC, 405449625, Georgia, Tbilisi, Vake District, Ilia Chavchavadze Avenue, N 29,
- "New Digital Technologies" LLC, 405225439, Georgia, Tbilisi, Vake District, Ilia Chavchavadze Ave., N29, +995 032 242 00 00, support@MyCoins.ge
- JSC "eMoney Georgia", 202376026, Tbilisi, Georgia, Ilia Chavchavadze Avenue, N 74, +032 242 46 46, [support@emoney.ge](mailto:support@emoney.ge)
- Identomat Inc, State of Delaware, (SR 20204194256; certificate of incorporation n7977895), 701 ASHTON LN S, CHAMPAIGN, IL 61820, USA,
- Amazon Web Services EMEA SARL, 38 Avenue John F.Kennedy, L – 1855, Luxembourg,
- DigitalOcean, LLC, 101 6th Ave, New York, NY 10013, United States.

When you agree to the processing of your data for direct marketing purposes, this means you agree to the following text:

I, the data subject, agree that Digital Platform LLC (hereinafter referred to as "Bitcredit") may process my personal data for direct marketing purposes using any communication channel, such as contact, identification, transactional, financial, socio-demographic, interactive, and geo-location data. I understand that this includes the following and is carried out as follows:

- Information about current/planned promotions and offers at Bitcredit, which may include information about both products directly and services/offers/promotions from partner companies related to these products;
- Marketing offers from Bitcredit may be made through any communication channel(s) available to Bitcredit, including (but not limited to) notifications in Bitcredit service channel(s) (personal cabinet, application, website), SMS or phone calls to the client's contact phone number, and/or sending messages to email addresses;
- My consent is indefinite; however, I have the right to withdraw consent at any time and request Bitcredit to stop processing my data for direct marketing (advertising) purposes by email: support@Bitcredit.ge, call center 032 242 46 46, or by filing a request at the office;
- Bitcredit is obligated to cease processing relevant data for direct marketing purposes no later than 7 (seven) working days after my proper request, after which I will not receive offers from Bitcredit regarding its services and products;
- Consent to data processing for direct marketing purposes is voluntary and providing consent is not a mandatory prerequisite for receiving services from Bitcredit;
- By giving consent, Bitcredit will be able to offer products, services, various promotions, however, consent does not obligate me to use Bitcredit services;

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- In case of withdrawal of consent and/or refusal, I understand that Bitcredit will be unable to inform me about current promotions, products, and other services.

LLC "Digital Platform" serves only users identified/verified by JSC "EMoney Georgia" (payment service provider with registration number 0001-9004) in accordance with current Georgian legislation, including the Law of Georgia on "Facilitating the Prevention of Money Laundering and Terrorism Financing" and its subordinate normative acts. For uninterrupted opening of electronic accounts, LLC "Digital Platform" is obligated to establish the data subject's will and ensure the authenticity of consent. During the verification stage, JSC "EMoney Georgia" uses facial recognition/photo comparison, ID card/passport text reading, and Liveness verification services (Identomat Inc.). Within the service, LLC "Digital Platform" and its authorized third parties process your biometric and non-biometric personal data, including requesting, receiving, and/or storing data.

In order for Digital Platform LLC to fully and properly implement the data subject's service, within the scope of data processing, it is necessary to transfer to and/or request from the third parties listed below personal data about the data subject and/or third parties designated by them, including any data about account(s) held at Imani Georgia JSC and New Digital Technologies LLC (virtual asset service provider with registration number 0001-9404), including, without limitation, balances existing on these accounts at specific times and dates. The provision of data to Digital Platform LLC is voluntary; however, according to current legislation, obtaining this data by Digital Platform LLC is a necessary condition for the smooth opening of your electronic wallet account.

The listed third parties process information about the data subject or third parties designated by them (including, without limitation, by authorized persons upon Digital Platform LLC's order and/or when Digital Platform LLC itself is an authorized person and acts on behalf of and for the benefit of third parties as data processors).

We may share your data with another state if there are grounds for data processing provided by the Georgian Law on "Personal Data Protection" and appropriate guarantees for data protection and data subject rights are ensured in the respective state.

If we transfer your data to a country where there are no adequate data protection guarantees, Bitcredit will ensure the conclusion of an agreement on personal data transfer that ensures proper protection of client's personal data in accordance with legal requirements.

To properly protect your data, before transferring your personal data to third parties, we verify whether they have adopted appropriate organizational and technical measures to protect the data.



### **Special measures based on GDPR**

In case your personal data is shared beyond the European Union and European Economic Area, Bitcredit will take all steps to ensure data is processed securely and in accordance with this privacy policy, and Bitcredit will carry out international data transfers in compliance with legislation.

This may be implemented in various ways, for example:

- The country with which information is shared enjoys adequate protection guarantees in accordance with the European Commission's decision;
- In the absence of a European Commission decision, personal data may be transferred to a third country or international organization only if we take appropriate measures in accordance with GDPR. Additionally, you can receive information about relevant measures through the communication channels available in this policy;

In the absence of a European Commission decision or appropriate guarantees, including binding corporate rules, personal data may be transferred to a third country or international organization only in the following cases:

- The data subject explicitly agreed to the proposed transfer after being informed about the risks associated with the transfer due to the absence of European Commission decision and appropriate protection guarantees;
- The transfer is necessary to perform a contract between the data subject and the data controller or to implement pre-contractual measures at the data subject's request;
- The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the data controller and another natural or legal person;
- The transfer is necessary for public interest reasons;
- The transfer is necessary for the establishment or defense of legal claims;
- The transfer is necessary to protect the vital interests of the data subject or other persons and the data subject is physically or legally incapable of giving consent.

### **Client's Rights**

Your rights are protected in accordance with Georgian legislation and the General Data Protection Regulation (GDPR). Accordingly, based on the above regulations, you have the right to request information about how we use your personal data.

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Upon your request, "Bitcredit" will be obligated to provide you with the requested information.

We have the right to use your personal data only if there is a specific contractual and/or legal basis.

It is important that the processing of your personal data by "Bitcredit" is not harmful to you.

Processing of personal data of minors is permitted only in accordance with Georgian legislation and considering the best interests of the minor.

You have the right to receive information about the processed data concerning you, request their correction, updating, addition, blocking, deletion, and destruction. The law grants you the following rights, which can only be restricted in cases provided by legislation.

**Right to information and copy of data processing** - You have the right to be informed about the collection and use of your personal data. This means that upon request, we must provide you with details about which personal data we process, for what purpose and on what basis, how we collect it, how long we store it, to whom we transfer your personal data, etc. This data protection policy document is an example of this. You also have the right to receive a copy of personal data from "Bitcredit" that is processed in accordance with applicable law.

**Right to correct, update and complete data** - If your data processed by "Bitcredit" is incorrect, incomplete or inaccurate, you can request correction, updating and/or completion of the data and provide us with the necessary information.

**Right to stop, delete or destroy data processing** - You have the right to request us to stop, delete or destroy data processing (including profiling) about you. Please note that due to anti-money laundering, tax, business and consumer protection laws and other relevant legal acts, "Bitcredit" may be unable to immediately fulfill your request upon demand.

**Right to block data** - You can request data blocking (restriction of processing) when the accuracy of personal data is disputed by you or you request termination, deletion or destruction of data processing, during the period that allows us to verify the accuracy of personal data and consider the request; when processing is illegal, however, you refuse to delete personal data and instead request data blocking; "Bitcredit" no longer needs personal data for processing purposes, but you need the data to file a complaint/claim; when there is a need to retain data for use as evidence.

**Right to transfer data** - You have the right to request to receive data provided by you in a structured, commonly used and machine-readable format or request transfer of this data to another person responsible for processing. "Bitcredit" has the right to refuse to fulfill your request if it is technically impossible.

**Rights related to automated individual decisions** - The law gives you the right not to be subject to decisions made solely through automation, including profiling, except when decision-making based on

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profiling: (a) is based on your explicit consent; (b) is necessary to enter into or perform a contract between us; (c) is provided by law or by a subordinate normative act issued within the scope of authority delegated by law.

**Right to withdraw consent** - You can withdraw consent at any time, unless this contradicts legal requirements. The right of withdrawal can be exercised when the basis for processing is your consent. Please note that withdrawal of consent does not invalidate the legal consequences arising within the scope of and prior to the withdrawal of consent. Additionally, in case of consent withdrawal, we may be unable to provide you with complete service.

**Right to appeal** - If you believe your personal data is being processed in violation of legal requirements, you have the right to contact the Personal Data Protection Service of Georgia. For more information, you can visit the service's website <https://personaldata.ge/>

### **Restriction of your rights**

Your rights may be restricted if their implementation poses a threat to:

- State security, information security and cybersecurity and/or defense interests;
- Public security interests;
- Crime prevention, crime investigation, criminal prosecution, administration of justice;
- Country's significant financial or economic (including monetary, budgetary and tax), public health and social protection interests;
- Detection of violations of professional ethics norms, including regulated profession ethics, by the data subject and imposing liability;
- Your or others' rights and freedoms;
- Protection of state, commercial, professional and other types of secrets provided by law;
- Substantiation of legal claims or counterclaims.

"Bitcredit" applies the restriction measure only adequately and proportionally to the purpose of the restriction.

### **Your Obligations**

In order to receive the service, it is necessary for us to have complete and accurate information about you. Therefore, please notify us if your contact and/or other information changes.

If you wish to receive information about your data or take additional action, please contact us at the email address indicated below, through our website, or visit any of our branches. Your request will be reviewed and you will be notified of the response within 10 days.

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### **Data Retention Period**

We store your personal data throughout your entire service period; also, after the termination of service for up to 15 years due to the following reasons:

- To respond to questions and complaints
- To confirm fair treatment towards you
- For the purposes of conducting business within the framework of existing regulations related to our activities

Your data may be stored for more than 15 years in cases where we are unable to delete it due to relevant legal grounds.

### **Data Security Protection**

We store the processed data about you in accordance with legal requirements. We provide physical, technical and organizational guarantees to protect your data. We protect the security of our electronic devices, files, and building. We also have physical, electronic and procedural control mechanisms to protect your data from unauthorized access, use, transfer, loss or destruction.

Our employees adhere to data confidentiality and security policies and procedures in accordance with legislation and internal organizational documents.

### **Contact Information**

Additionally, you can contact Bitcredit's hotline 24 hours a day at: +995 32 2 42 46 46 or email us at [info@bitcredit.ge](mailto:info@bitcredit.ge)

### **Changes**

We may periodically make changes to this document. The updated document will be published on our website with the date of change indicated.