



BTCS (Middle East) LTD

Privacy Notice

01. June 2026



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1. WHAT DOES THIS PRIVACY NOTICE COVER?

This Privacy Notice applies to all forms of use of Personal Data ("processing") by the Company in the ADGM.

In this Privacy Notice, we inform you about when, how and for what purpose we collect and process Personal Data when you visit our website at www.bitcoinsuisse.com, use our BTCS ME web and mobile applications ("BTCS ME Online Tools") or interact with us through our social media pages. This Privacy Notice also covers the collection and Processing of Personal Data when you obtain services or products from us or interact with or contact us in relation to a contract or inquire about our services as a prospect. Additionally, we may inform you about the Processing of your Personal Data separately, for example, in consent declarations, terms and conditions, additional privacy notices, forms, and other notices.

2. HOW WE GET YOUR INFORMATION

We collect your information in different ways, specifically:

- Information you give to us. This covers data given by you as well as data provided by people linked to your business service or people working on your behalf:
 - when you contact us;
 - when you visit our website or use other digital offerings;
 - when you register as a user and/or client on the BTCS ME Online Tools;
 - when you visit our offices;
 - when you open an account with us;
 - when you use our services; or
 - when you apply for a job with us.
- From third party companies (such as referencing agencies or public sources):
 - in correspondence or meetings with clients or business partners;
 - from publicly accessible registers, websites and similar;
 - from authorities and regulators;
 - from third party provider and platforms, such as credit rating agencies or compliance database providers, etc. (e.g. to verify your signature authorization or your identity); or
 - from referees provided by you in the application process;
 - from clients with respect to other persons involved in the business relationship with us, such as representatives, signatories, proxies, asset managers, or beneficial owners.

3. INFORMATION WE HOLD ABOUT YOU

Depending on the service we provide to you, we collect Personal Data about you including:



- Personal details (e.g. name, date of birth or other identification information);
- Identification data and authentication data (e.g. passports, Emirates ID or other government issued ID numbers, sample signature, photographs);
- Contact details (e.g. phone number, email address, postal address or mobile number);
- Financial information (e.g. bank account number, credit or debit card numbers, financial history);
- Data obtained during the fulfillment of our contractual obligations;
- Information about a client's or a Data Subject's financial situation e.g. creditworthiness data, scoring/rating data, origin of assets, source of wealth;
- Where relevant, professional information about you, such as your job title and work experience;
- Data related to designation as a politically exposed person (PEP);
- Access requirements (e.g. for event organization purposes);
- Data from interactions with us together with documentation data e.g. file notes or meeting minutes;
- Marketing and sales data;
- your knowledge of and experience in investment matters;
- in some cases (where permitted by law), special categories of Personal Data, such as your biometric information, political opinions or affiliations, religious or philosophical beliefs, and, to the extent legally possible, information relating to criminal convictions or offences.

4. PURPOSE OF PROCESSING

We will always process your Personal Data for a specific and only process Personal Data which is relevant to achieve that purpose. We process Personal Data for the following purposes:

- Communication: Responding to your inquiries and communicating with you.
- Business Relationship: Client onboarding preparation, conclusion, client relation management, administration, and performance of contractual relationships (e.g., processing your registration, job applications, etc.).
- Security and Access Control: Ensuring the security of our systems and controlling access, to prevent and detect fraud, money laundering and other crimes (such as identity theft).
- Compliance: To undertake checks for the purposes of security, detecting and preventing fraud and money laundering, and to verify your identity before we provide services to you. These checks may reveal political opinions or information about criminal convictions or offences, adhering to laws, directives, and recommendations from public authorities.
- Marketing and Business Relationship Management: Providing the website, and BTCS ME Online Tools; optimizing our posts on our social media entity pages; processing registrations for events; informing you about new developments at BTCS ME and new services (e.g., via our newsletter, although you may notify us at any time if you wish to opt out of receiving such information in the future).
- Market Research, Service and Operations Optimization, and Product Development: Analyzing and optimizing the use of the website, BTCS ME Online Tools, and services.



- Advertisement and Marketing Activities: Conducting advertising and marketing activities.
- Regulatory and legal obligations, enforcement of Legal Claims: To comply with regulatory and legal obligations to which we are subject and cooperate with regulators and law enforcement bodies and enforcing legal claims and managing legal disputes.

5. WHAT WE USE YOUR INFORMATION FOR AND THE LEGAL BASIS FOR DOING SO?

5.1. Legal basis for Processing

The Company processes Personal Data in accordance with ADGM laws and regulations. We are not permitted to process Personal Data if we do not have a valid legal ground. Accordingly, we will only process your Personal Data if one of the following legal basis applies:

- Performance of a Contract: To allow us perform our contractual obligations towards you or take pre-contractual steps at your request;
- Compliance with Legal Obligations: To allow us to comply with our legal or regulatory obligation, for example obtaining proof identification to meet our AML obligations;
- Vital Interest: To allow us protect the vital interests of the relevant individual or of another natural person;
- Legitimate Interest: Necessary for the legitimate interests of the Company, without unduly affecting your interests or fundamental rights and freedoms and to the extent such Personal Data is strictly necessary for the intended purpose;
- Consent: Where we have your consent to do so. Where we ask for your consent for certain processing activities, we will inform you separately about the relevant processing purposes. You may withdraw your consent at any time with effect for the future by providing us with written notice (by mail) or, unless otherwise noted or agreed, by sending an email to us (see section 5.3). Once we have received notification of the withdrawal of consent, we will no longer process your information for the purpose(s) you consented to, unless we have another legal basis to do so. Withdrawal of consent does not affect the lawfulness of the processing based on the consent prior to withdrawal.

Where required, we process your data beyond the actual fulfillment of the contract for the purposes of the legitimate interests pursued by us or a third party such as:

- Consulting with third party data providers;
- Reviewing and optimizing procedures for needs assessment for the purpose of direct client discussions;
- Marketing unless you have objected to the use of your data;
- Obtaining Personal Data from publicly available sources;
- Measures for business management and further development of services and products;
- Risk and compliance control;
- Regulatory matters and reporting;
- IT security and IT operation;
- Prevention and investigation of crimes;



- Measures to protect our premises to keep out trespassers and to provide site security (e.g. access controls).

5.2. Your obligations

In the context of our relationship, you must provide all Personal Data that is required for accepting and carrying out a business relationship and fulfilling the accompanying contractual obligations or that we are legally obliged to collect.

In particular, anti-money laundering regulations require us to identify you on the basis of your identification documents before establishing a business relationship and to collect and put on record information which may include name, place and date of birth, nationality, address and identification details for this purpose.

In order for us to be able to comply with these statutory obligations, you must provide us with the necessary information and documents in accordance with applicable anti-money laundering regulations, and to immediately disclose any changes over the course of our relationship. If you do not provide us with the necessary information and documents.

Where the Personal Data we collect from you is needed to comply with our legal or regulatory obligations or enter into an agreement with you, if we cannot collect this Personal Data there is a possibility we may be unable to onboard you as a client or provide our services to you (in which case we will inform you accordingly).

5.3. Your consent

If you have granted us consent in accordance with the ADGM regulations to process your Personal Data for certain purposes, this processing is legal on the basis of your consent. Consent given can be withdrawn at any time by notifying us using the contact methods set out 9 below. Withdrawal of consent does not affect the legality of data processed prior to the withdrawal.

6. HOW DATA IS PROCESSED

Personal Data is processed both manually and electronically in accordance with the above-mentioned purposes and, in any case, in order to guarantee data security and data confidentiality in compliance with current regulations. Our employees and third-party processors can access your data. Our employees and third-party processors are appropriately designated and trained to process data only according to the instructions we provide them. All the data will be processed for the duration of your business relationship with us and subsequently for the fulfillment of legal obligations.

7. WHO HAS ACCESS TO PERSONAL DATA AND WITH WHOM ARE THEY SHARED?



7.1. Outside the Company

To extent permitted under applicable law, we may also transfer Personal Data to third-parties outside the Company, such as:

- **BTCS Group Entities:** A BTCS Group entity may use Personal Data according to this Privacy Notice for the same or other purposes as we use it, including dual onboarding at another BTCS Group entity.
- **Authorities:** E.g. regulators, enforcement or exchange body or courts or party to proceedings where we are required to disclose information by applicable law or regulation or at their request, or to safeguard our legitimate interests.
- **Service Provider:** Other financial service institutions or comparable institutions in order to carry out services required by you, and others for the purpose of ensuring that we can meet the requirements of applicable law, contractual provisions, market practices and compliance standards in connection with services we provide to you. To service providers and agents such as IT services, logistics, printing services, telecommunications, collection, advice and consulting, and sales and marketing.
- **Other Third Parties:** to a natural or legal person, public authority, agency or body for which you have given us your consent to transfer Personal Data to or for which you have released us from banking confidentiality.

We reserve the right to make such disclosures even of Sensitive Personal Data (unless we have expressly agreed with you that we will not disclose such data to certain third parties, except if we are required to do so by law).

We conduct thorough due diligence on third parties to ensure they have adequate data protection measures in place. This includes assessing their security practices, compliance with data protection laws, and their ability to uphold Data Subject rights.

We have implemented appropriate organizational and technical safeguards to protect Personal Data for which we act as Data Controller or Processor, including when disclosing such data to third parties or group entities.

7.2. Data transfers to other countries

- Your Personal Data may in some cases be processed outside the ADGM. We will only transfer Personal Data outside ADGM, provided:
- The third countries which are considered by the ADGM Commissioner of Data Protection as a jurisdiction providing adequate level of Data Protection;
- In the absence such legislation that provides adequate protection, based on appropriate suitable safeguards (e.g. standard data protection contractual clauses and enforceable data subject rights or statutory exemption provided by local applicable law); or
- You have explicitly consented to the proposed transfer.

Please contact us if you would like to request a copy of the specific safeguards applied to the processing of your information.



8. DATA RETENTION

We will process and store clients and Data Subjects Personal Data for as long as it is necessary to fulfill the purpose for which it was collected to comply with legal, regulatory or internal policy requirements.

We will only retain information that enables us to:

- Maintain business records for analysis and/or audit purposes;
- Comply with record retention requirements under the law (for example, as required under legislation concerning the prevention, detection and investigation of money laundering and terrorist financing);
- Defend or bring any existing or potential legal claims;
- Deal with any future complaints regarding the services we have delivered;
- Assist with fraud monitoring;
- Legal Hold requirements.

9. PURPOSES OF PROCESSING

We always aim to use our Personal Data in a way that is fair to you. You have a legal right to:

- Obtain information about what Personal Data we store about you and how we process it.
- Request a copy of the Personal Data we hold about you.
- Inform us to correct or rectify any inaccuracy in the data we hold about you.
- Exercise your right to restrict use of your Personal Data.
- Exercise your right to erase your Personal Data.
- Withdraw your consent where the Company obtained your consent to process Personal Data.
- The right to request any details and information of automated decision making (e.g., profiling, the logic involved, expected consequences of such processing etc.).
- Object to decisions based solely on automated processing including profiling.
- The right to request that the automated decision be reviewed by a human.

In addition to the above rights, you have the right to object at any time to:

- the processing of your Personal Data to the extent permitted.
- for direct marketing purposes, and profiling to the extent related to direct marketing.
- where your Personal Data being disclosed to third parties for the purposes of direct marketing.

Your right to exercise these rights are not absolute. They will depend on a number of factors and in some instances, we will not be able to comply with your request as exemptions may be engaged. We will usually, in response to a request, ask you to verify your identity and/or provide information that helps us to understand your request better. If we do not comply with your request, we will explain why.



10. EXTENT OF AUTOMATED DECISION MAKING

In establishing and carrying out a business relationship, we generally do not use any fully automated decision-making. In certain situations, to ensure efficiency and consistency in our decision-making processes, we may automate discretionary decisions that have legal effects on you or similarly significantly impact you ("automated individual decisions"). For example, this may occur as part of our online onboarding process. In such cases, we will inform you accordingly and take all measures required by applicable law. Your rights regarding automated decision-making are detailed in Section 9 above.

If we use this procedure in individual cases, we will inform you of this separately, provided it is a legal requirement to inform you. You have a right to object in certain instances where a decision is taken by us based only on automated decision making and to require such a decision to be reviewed manually.

Profiling

We may also process some of your data automatically to assess certain personal aspects, which might be considered profiling under applicable privacy laws. We may use assessment tools to provide you with tailored notifications and for compliance with legal and regulatory requirements particularly, where we are required to combat money laundering, terrorism financing, fraud, and assess risk and offences that pose a danger to us, our clients, or the wider community at large. Your rights regarding profiling are outlined in in Section 9 above.

11. PROVISION AND USE OF OUR WEBSITE, BTCS ME ONLINE TOOLS

11.1. Use for Information

You can visit the website and find out about our services without telling us who you are. As with any connection to a web server, the server on which we provide the website automatically logs and stores certain technical data.

11.2. Use of our BTCS ME Online Tools

We operate BTCS ME Online Tools. When you register as a client on the BTCS ME Online Tools, we collect the information you provide to us. This includes general Personal Data such as name and contact details as well as personal information that you or other users enter, upload, generate, store and process when using the BTCS ME Online Tools. We use Google Authenticator and reCAPTCHA in order to make the registration process as safe as possible and protect our website.

11.3. Resources from External Websites

We include resources from external servers on our website. These contain visible content (videos, images), communication functionalities (e.g., chat plugins), as well as technical resources.

The technical resources are used to improve the performance or security of our website. When calling up these resources, the operator of the external servers learns your IP address and/or certain marginal data that are necessary for the use of the servers of the external operator.



12. USE OF OUR SOCIAL MEDIA SITES

On our pages or through our presence on social media platforms, you will find information on current developments and our range of services. We receive Personal Data from you and from the platforms when you interact with us through our online presence (for example when you communicate with us, comment on our content or visit our online presence). The respective social media platforms collect and analyze usage data such as the number of visitors and demographic information about the visitors of our company page. We may receive reports based on this data. The reports only contain aggregated or otherwise sufficiently anonymized data. Only the providers of the respective social media platform can identify you on the basis of the usage data collected.

At the same time, the platforms analyze your use of our online presences and combine this data with other data they have about you (for example about your behavior and preferences). They also process this data for their own purposes, for marketing and market research purposes (for example to personalize advertising) and to manage their platforms (for example what content they show you) and, to that end, they act as separate Controllers.

13. USE AND OPTIMIZATION OF OUR NEWSLETTER

When you sign up for our newsletter, we collect the information you provide to us. This includes general Personal Data such as first name, last name and email address. We use analytics services to measure and analyze the use of our newsletter. The analytics services collect and analyze usage data such as the number of people who have opened a newsletter or clicked on certain posts. We receive evaluations based on this. These allow us to optimize our newsletter and provide you with content that interests you.

You can let us know at any time that you would like to stop receiving our newsletter in the future. To do so, please use the unsubscribe link at the end of the newsletter.

14. COOKIES

Under Our Site may use “cookies” to enhance user experience. A cookie is a small piece of data that a website stores on a visitor’s computer or mobile device. user’s web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. Users may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the site may not function properly.

Cookies include small text files or similar mechanisms that are stored on your device when you access our services. They help us remember your preferences, analyze interactions, and improve the functionality of our website.

Our intention is not to identify you personally through these technologies, and we do not link the information gathered via cookies with other data we may have about you. This ensures your privacy while allowing us to provide a more personalized and efficient user experience.

We use the following technologies:



- Microsoft Azure Application: For monitoring and improving performance;
- PostHog: For analyzing user behavior;
- Sprig: For collecting feedback and improving usability; and
- LaunchDarkly: For managing feature flags and ensuring efficient maintenance.

Some cookies and similar technologies are essential for the proper functioning of our website, while others are used to analyze usage patterns or enable specific features. Where the use of these technologies involves the processing of Personal Data, we comply with the applicable data protection laws and regulations.

You can manage your preferences by configuring your browser or device settings to block non-essential cookies or prompt you before they are stored. You can also delete existing cookies or data stored on your device. Additionally, our website provides a cookie preferences tool, allowing you to adjust your settings at any time. Consent for non-essential cookies and similar technologies can be withdrawn at any time through the preferences tool or by contacting us.

15. EXERCISING YOUR RIGHT

Please send your request using the attached form to:

If you feel that we have not complied with applicable data protection and privacy rules, please let us know and we investigate your concern. Please raise any concerns by contacting the Data Protection Office.

Address:

BTCS (Middle East) Ltd.
1117, 11 Floor, Al Maqam Tower, Regus ADGM Square,
Abu Dhabi Global Market Square,
Al Maryah Island, Abu Dhabi, United Arab Emirates
E-mail: dataprotection@bitcoinsuisse.com

If you feel that we have not complied with applicable data protection and privacy rules, you may lodge a complaint with the Competent Authority.

16. CHANGES TO THE PRIVACY NOTICE

This Notice explains how the Company handles your Personal Data and your rights under the DPR 2021, rather a document that binds the Company or any other party contractually. A copy of this Privacy Notice can be requested from us using the contact details set out above. We may modify or update this Privacy Notice from time to time.

Where changes to this Privacy Notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice.