



# BitInvest (Pty) Ltd

## Privacy Policy

### **IN LINE WITH THE PROTECTION OF PERSONAL INFORMATION ACT, 4 OF 2013 (“POPI”)**

This Privacy Policy describes our policies and procedures in addition to the terms and conditions as stated on our website (which cumulatively are referred to as our “Privacy Policy”) on the collection, use and disclosure of your personal information when You, as our client, utilise the BitInvest services.

We use your Personal data in order to fulfil our services, as a company which exploits cryptocurrency arbitrage for the benefit of our clients. In order to fulfil the aforementioned mandate, we need to process your personal information securely. This entails processing your personal information by directly obtaining same from you as the client, safely securing same and using same for the aforementioned purpose, but also in related to purposes indirectly connected to our primary mandate, which includes engaging with our forex brokers to open up the intermediary bank account on your behalf and engaging with our tax consultants which you hereby and in the ordinary course of our communication consent to, for the purpose of obtaining tax clearance approval by the South African Revenue Services (“SARS”). Such information will therefore be processed, safely secured, and provided to our brokers, tax clearance agents, and the relevant cryptocurrency exchanges who will process your information as independent entities in line with their own privacy protocols, which we are not responsible for.

By entering into the Agreement with BitInvest, You agree to the collection and use of information in accordance with this Privacy Policy and our terms and conditions as stated on our website.

# Definitions

For the purposes of this Privacy Policy:

- **Account** means an account or all the accounts in relation to the BitInvest registration and Agreement, broker account, Mercantile Bank Account and the relevant cryptocurrency exchange accounts. This may mean the singular or collective of the above, as the context may indicate.
- **Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to BitInvest (Pty) Ltd, Block C, Montecircle Office Park, Montecasino Boulevard, Fourways, Johannesburg.
- **Country** refers to: South Africa
- **Device** means any device that is utilised for the Services We provide, such as a computer, a cellphone or a digital tablet.
- **Personal Data** is any information that relates to an identified or identifiable individual, of a personal nature, as defined by the POPI Act.
- **Service** refers to the services as listed on our Website and in our Agreement (being the Agreement as accepted by the Client upon registration on Our Website and subject to change from time to time).
- **Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related and necessary to the Service..

- **Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- **Website** refers to BitInvest, accessible from [www.bitinvest.co.za](http://www.bitinvest.co.za)
- **You** means the individual accessing or using the Service.

# Collecting and Using Your Personal Data

## Types of Data Collected

### Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You, or which is needed in order to fulfil our Services. Personally, identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Usage Data
- Financial documents
- Bank account and asset statements
- SARS username, login details and related information.
- Any additional information as requested by the Company and provided by the Client.

### Usage Data

Certain Usage Data is processed automatically when using the Service.

Usage Data may include information such the pages of our website that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data, if so applicable.

## Use of Your Personal Data

The Company may use Personal Data for the following purposes:

- **To provide and maintain our Service**, including to monitor the usage of our Service.
- **To manage Your Account:** to manage Your registration as a user of the Service. The Personal Data will be used to fulfil our mandate as per the Services listed in the Agreement and on our website.
- **To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonably required.
- **To provide You** with news, special offers and general information about our services which are reasonably necessary to update our Clients and to fulfil our Services.
- **To manage Your requests:** To attend and manage Your requests to Us.
- **For related attendances in order to fulfil our mandate:** We may provide our brokers (who are registered financial services providers) and tax clearance agents with your personal information for the fulfilment of Our mandate, as referred to above.
- **For other purposes:** We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.

- **With Your consent:** We may disclose Your personal information for any other purpose with Your consent.

## **Retention of Your Personal Data**

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

## **Transfer of Your Personal Data**

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. We also securely store personal information on our cloud services provider once the information has been provided to us by our clients. It means that this information may be transferred to and maintained on computers located outside of Your province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer. An example of such a transfer is the registering an account for You on an international cryptocurrency exchange.

## **Disclosure of Your Personal Data**

### **Business Transactions**

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

### **Law enforcement**

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### **Other legal requirements**

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

## **Security of Your Personal Data**

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

## **Changes to this Privacy Policy**

We may update Our Privacy Policy from time to time, by uploading same to our website. Should you wish to view the updated privacy policy from time to time, please visit our website.

You are therefore advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **Contact Us**

If you have any questions about this Privacy Policy, You can contact us:

- By email: [admin@bitinvest.co.za](mailto:admin@bitinvest.co.za)