



## **Our vision on privacy**

Paucitas B.V. (we form), based in the Netherlands, provides services to our website visitors, (former) customers and other (natural) persons who have contacted us (you form). Our services include securely setting up a hardware wallet with advanced security measures, providing support with all your questions about blockchain and cryptocurrencies and other services as described on our website and in our terms and conditions. As part of these services ("Services"), we process personal data.

We consider protection of the personal data we process to be of utmost importance. When processing personal data in the Netherlands, we are bound by the General Data Protection Regulation as of May 25, 2018. In this privacy regulation we explain how we protect your privacy and how we handle your personal data.

Do you have any questions about these privacy regulations? Then you can read in these privacy regulations how you can contact us about this.

## **Who processes your personal data?**

These privacy regulations deal with the processing of personal data by Paucitas B.V. as the data controller. Our company is located in (1016 BT) Amsterdam at Herengracht 244-4. You can reach us by phone during office hours at 020 244 5774 or by email by emailing [paucitas@paucitas.com](mailto:paucitas@paucitas.com).

## **Use of personal data**

If you use our website or Services that we offer, you may share personal data with us. We collect and use personal data that you share directly with us. We will not use personal data for purposes other than those described in this statement unless you have given your prior consent.

## **What personal data do we process?**

Personal data is data that says something about you or data that can be associated with you. Anything that can be done with your personal data, for example collecting, storing, using, transferring or deleting your data, is called "processing" personal data. We process personal data that you have provided to us by, for example, sending us an e-mail.

When you use our Services, we may collect the following data:

- Personal identification information such as your name, surname, date of birth, place of birth, gender, height, nationality and your passport photograph;
- Contact information such as your address, zip code, city, phone number and email address;
- Payment information such as a VAT number or bank account number;
- Other information you voluntarily decide to share with us, such as social media accounts, IP addresses, browser settings, feedback and opinions;
- Other information necessary for the purposes of our service.

This may also include personal data we obtain from other sources, such as personal data from the Trade Register of the Chamber of Commerce, the Land Registry and personal data available on public (business) websites. We may also receive personal data from our clients.

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**For what purposes and on what grounds do we process your personal data?**

We generally process your personal data for the following purposes and based on the processing grounds listed in the table:

<b>Purpose</b>	<b>Data necessary for this purpose</b>	<b>Processing basis</b>
Our financial administration	Company name and/or name and address, billing address, payment and bank information, outstanding balance	Legal obligation
Invoicing	Company name and/or name and address, billing address, payment and bank information, outstanding balance	Legal obligation
Quote	Company name and/or name and address information, e-mail address, signature, IP Address, location, date, time, and other data necessary to prepare the offer	Legitimate interest
Services	Company name and/or name and address information, e-mail address, financial data, and other data necessary for our services	Necessary for the performance of the agreement
Complaint handling, or other communication with you (e.g. through our customer service department)	Company name and/or name and address details, e-mail address, financial data, your feedback/opinion	Necessary for the performance of the agreement
CRM	Company name and/or name and address, e-mail address, location and phone number	Legitimate interest

Job application	NAW data, email address, phone number, location, profile picture, employment history and any other information you voluntarily decide to share with us	Legitimate interest, or consent
Direct marketing	Company name and/or identifying information, email address, phone number and mailing/billing address	Legitimate interest
Analysis of statistics and optimization of Services	Full name and/or company name, email address, phone number, IP address, the browser you are using to send the message, date, time, and the message you are sending	Legitimate interest

### How do we handle your personal data?

We ensure that your personal data is protected against loss, unlawful processing, or misuse. Among other things, we have taken the following technical and organizational measures:

- Logical access control, for example through the use of passwords;
- Minimizing and updating personal data;
- Maintaining retention periods that are as short as possible;
- Encrypting and pseudonymizing data where appropriate;
- Purpose-bound access restrictions;
- Two-step verification;
- Verifying recognized authorizations.

### How long do we keep your personal data?

We take great care to ensure that all your data is carefully stored and protected. We do not keep your data longer than is necessary for the purpose for which it is processed. For example, we keep your personal data for as long as you use our Services. We comply with legal retention periods. In general, for example, we keep personal data of our website visitors for 12 (twelve) months and we keep personal data for the purpose of our financial records for at least 7 (seven) years. Have you applied for a job with us? Then we will keep your application letter and CV for 4 (four) weeks after the application process has ended unless you have given us written permission to keep this personal data longer.

### Do we share your personal data with third parties?



In principle, we do not share your personal data with third parties without your permission. However, sometimes it may be necessary to share your personal data with third parties. For example, it may be necessary to share your personal data with legal authorities or with an opposing party. In addition, it may be necessary to share your personal data in order to conclude an agreement or notarial deed. Data may also be shared with contractors engaged by us, such as a bailiff or a hosting party. Furthermore, there may be legal obligations that require us to share your personal data with third parties. If a court order requires us to provide personal data to third parties, we will have to comply with it. Your personal data will not be shared with third parties for commercial purposes.

### **Third party websites and services**

Our practices are designed to minimize the need to share information with third parties. Thus, information is shared only when necessary to perform our service and only with parties with an appropriate level of protection and security.

Through our website, users may, for example, link to other third-party websites that provide useful information. These privacy regulations only cover personal data that we ourselves process in the context of our Services. Therefore, this privacy regulation does not apply to websites or applications of third parties, such as Google or Wordpress. We cannot guarantee that these third parties will handle your personal data in a safe and reliable manner. You should therefore always read the privacy policies of these third parties. For example, Google's privacy policy can be found at <https://policies.google.com/privacy>, WordPress' privacy policy at <https://automattic.com/privacy/>.

### **Transfer of personal data**

To accomplish the purposes described in these privacy regulations, we may transfer your personal data outside the EEA. For example, we use WordPress to build our website. We will only transfer personal data outside the EEA if the relevant country provides an adequate level of security and we comply with the conditions set out in the AVG with this processing. When your personal data is processed outside the EEA, we will take appropriate measures to ensure that the personal data is properly secured.

### **Automated decision making**

Paucitas B.V. does not make decisions about matters that can have (significant) consequences for individuals based on automated processing. This concerns decisions that are made by computer programs or systems, without a person (for example an employee of Paucitas B.V.) being involved.

### **Cookies, or similar techniques, that we use**

Paucitas B.V. uses functional, analytical and tracking cookies. A cookie is a small text file that is stored in the browser of your computer, tablet or smartphone when you first visit this website. Paucitas B.V. uses cookies with a purely technical functionality. These ensure that the website works properly and that, for example, your preferences are remembered. These

cookies are also used to make the website work properly and to be able to optimize it. In addition, we place cookies that track your surfing behavior so that we can offer tailored content and advertisements. During your first visit to our website, we informed you about these cookies and asked your permission to place them. You can opt out of cookies by configuring your internet browser to stop storing cookies. In addition, you can also delete any information previously stored via your browser settings. For an explanation, see [www.veiliginternetten.nl/thema/je-bedrijf/wat-zijn-cookies/](http://www.veiliginternetten.nl/thema/je-bedrijf/wat-zijn-cookies/).

Cookies are also set on this website by third parties. These include advertisers and/or the social media companies. Google Analytics, Facebook and Adwords.

### **View or modify your personal data?**

Would you like to know which personal data we have recorded about you? You can ask Paucitas B.V. for an overview of the personal information that has been or is being processed about you. If you believe that your personal data is incorrect or incomplete or if you do not think it is necessary that certain personal data has been processed, you can submit a request for amendment, addition or deletion to Paucitas B.V. You also have the right to object to the processing of your personal data and you have the right to data transfer. You also have the right to withdraw a granted consent for the processing of your personal data. This is the case, for example, when receiving a newsletter.

To make sure that the request for inspection is made by you, we ask you to send a copy of your ID with the request. In this copy, black out your passport photo, MRZ (machine readable zone, the strip of numbers at the bottom of the passport), passport number and Citizen Service Number (BSN). This is to protect your privacy. If you send us such a request, we will provide you with information about the actions we have taken as soon as possible, but in any case within 4 (four) weeks of receiving your request.

For questions or complaints regarding the processing of personal data by Paucitas B.V., please email [paucitas@paucitas.com](mailto:paucitas@paucitas.com) or address your written requests to:

Paucitas B.V.  
Request for inspection of personal data  
Herengracht 244-4  
1016 BT Amsterdam

### **Complaints by supervisor**

The Personal Data Authority monitors whether companies comply with the General Data Protection Regulation. If you believe that we do not comply with the applicable privacy legislation, you can contact us. We will be happy to help you find a solution. In addition, you always have the right to file a complaint with the Personal Data Authority.



### **About this privacy regulation**

The regulations in the field of privacy law change regularly. Our privacy policy is therefore never completely finished, but we do our best to keep our policy up to date. Paucitas B.V. may therefore change these privacy regulations from time to time. If these changes are also of interest to you, we will alert you or make the changes known to you in a conspicuous manner. The most current version of our privacy policy can always be found on our website. This privacy regulation was last amended on 18 October, 2023.