

Privacy Policy

This Privacy and Data Retention Policy (the Policy) explains the way in which BitTorro.io operators collect, use, share, and protect Personal Information of Users (“you”) obtained through the BitTorro (“Website”), any related applications and its exchange tools integrated into third-party services (“Services”). The terms “we,” “BitTorro,” “us”.

“Personal Data” is an information that identifies or can be used to identify, contact, or locate the person to whom such information pertains.

At BitTorro.io, we are fully committed to respecting privacy and to protecting any information that our clients provide. Your privacy and security are both our highest priorities and we make every effort to ensure that all the information provided by you is protected.

We follow and comply with best practices and regulation in the sphere of privacy including but not limited to General Data Protection Regulation (GDPR).

1. Why we collect your personal information

BitTorro respects the privacy of its Users by not requesting any information that is unnecessary for the use of the service or to comport with our obligations under applicable law.

Personal information is data that can be used to identify you directly or indirectly, or to contact you. Our Privacy Policy covers all personal information that you voluntarily submit to us and that we obtain from our partners. This Privacy Policy does not apply to anonymised data, as it cannot be used to identify you.

You may be asked to provide personal information anytime you are in contact with BitTorro. We may use your personal information in accordance with this Privacy Policy. Except as described in this Privacy Policy, BitTorro will not give, sell, rent or loan any personal Information to any third party.

Categories of data involved in data processing include:

- Personal Identification Information: Name, e-mail, date of birth, nationality, gender, utility bills, photographs, phone number, mailing address, ID or other documents number and other details;
- Payment Information: Bank information, card information, transaction history;

Users can always refuse to supply personally identification information, except that it may prevent them from engaging in certain Service-related activities. Thus, in some cases, we will be unable to render services to you if you do not provide us personal identification information due to the requirements of anti-money laundering laws and other legal acts.

We may ask you to supply additional documents or information where it is necessary for compliance with our legal obligations e.g. in the prevention of fraud, money laundering and counter-terrorism.

We will ask User's consent before processing of aforementioned information in other purposes. When collecting such consents, we inform the Data Subject of the respective purposes of processing and such processing is conducted only when appropriate consent is received.

2. What type of information we collect

Any information that we collect is necessary either to provide you the services or to comply with legal regulations and legislation.

You may refuse to provide us with some types of the personal information requested, but in this case we may not be able to ensure that the service works properly for you and that all services are available.

Depending on the service you wish to use, we may collect the following types of information:

- Full name, date of birth, nationality, place of birth, age, phone number, home address, and/or email.
- Tax number, passport number, driver's license details, national identity card details, photograph identification cards.
- Bank account details, payment card details, transaction history, trading data, and/or tax identification.
- Survey responses, information provided to our support team, public social networking posts, authentication data, security questions, user ID, other data collected via cookies and similar technologies.

3. How your personal information is used

The main purpose for collecting personal information is to provide you with a secure, and convenient experience. How this information can be used:

- to create, develop, operate, deliver, and improve the services that you use on BitTorro website;
- to comply with the legal requirements and applicable legislation;
- for loss prevention and anti-fraud purposes.

4.Children Personal Data

We do not intend to solicit or collect Personal Data from anyone under the age of 16 or under the legal age of your country, if it is higher. If you are under 16 or are not of a legal age of your country, do not enter on our Website. . If you are under the age of 18 do not use our exchange platform or share personal data such as your email.

5. Additional information from external sources.

We may obtain information about you from third party sources as required or permitted by applicable law, such as public databases, credit bureaus, ID verification partners, resellers and channel partners, joint marketing partners, and social media platforms. We obtain such information to comply with our legal obligations, such as anti-money laundering laws. Our lawful basis for processing such data is compliance with legal

obligations. In some cases, we may process additional data about you to ensure our Services are not used fraudulently or for other illicit activities.

6. Automatically collected information.

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration, problem solving and service improvement. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

7. Cookies

One of the ways we collect data about your use of BitTorro service is through the use of cookies. It helps us with the analysis of the visits to our services and helps us to deliver a better product. You can manage cookies through the settings of your internet browser. You can have the browser notify you when you receive a new cookie, delete individual cookies or delete all cookies.

8. Sharing personal Information with other parties

BitTorro may share your information in the following circumstances:

- We share your information with third party identity verification services in order to prevent fraud. This allows BitTorro to confirm your identity by comparing the information you provide us to public records and other third party databases.
- We may share your information with financial institutions with which we partner to process payments you have authorised.
- We may share your information with with law enforcement or regulatory agencies, as may be required by law.

9. Protection of the personal information

We will not permit any third parties to contact you directly on an unsolicited basis in relation to their own products or services. We do not sell, trade, or rent your personal identification information to others. You should never disclose your account password to unauthorized parties. We use certain security measures to help keep your personal information safe, but we cannot guarantee that these measures will stop any users try to get around the privacy or security settings on the Website through unforeseen and/or illegal activities.

10. Lawful Basis For Processing Data

The lawful bases for processing are set out in Article 6 of the GDPR

Personal Data	Lawful Basis
Email (Transaction Optional*)	Consent (Art.6 a)
Contact Forms	Consent (Art.6 a)
I.P.	Legitimate Interest (Art.6 f)

11. Your Rights

The right of access: This is a right for an individual to obtain confirmation whether a controller processes personal information about them and, if so, to be provided with details of that personal information and access to it.

The right of rectification: This is a right for an individual to obtain rectification without undue delay of inaccurate personal data a controller may process about them

The right to erasure: This is a right for an individual to require a controller to erase personal information about them on certain grounds – for example, where the personal information is no longer necessary to fulfil the purposes for which it was collected

The right to restriction: This is a right for an individual to require a controller to restrict processing of personal information about them on certain grounds;

The right to object: This is a right for an individual to object, on grounds relating to their particular situation, to a controller's processing of personal data about them, if certain grounds apply

The right to data portability: This is a right for an individual to receive personal information concerning them from a controller in a structured, commonly used and machine-readable format and to transmit that information to another controller, if certain grounds apply.

If any Request is received in relation to a data subject's rights (including the right to rectification, erasure, restriction, object or data portability) the Request must be sent at support@bittorro.io

12.Changes to our privacy policy

This privacy policy may change from time to time according to legislation or industry developments. We will not explicitly notify our customers or users of our site about these changes. Instead, we encourage you to occasionally review this page for any policy changes.

Last Updated: March 2020