# PRIVACY POLICY

## 1. General Provisions

1.1. This Policy sets out how BITKOR CJSC (TIN 02804202310105, 62 Kiev St, Bishkek, Kyrgyzstan; the Company) processes the personal data of the users of the megabit.kg platform (the Platform).

1.2. By registering on or using the Platform, the User accepts this Policy and consents to the processing of their personal data, including its transfer outside the Kyrgyz Republic.

1.3. User means a person registered on the Platform. Personal data means information that identifies the User. Processing means any action with personal data, including collection, storage, use, transfer and deletion.

## 2. Data Processed

2.1. Data provided by the User: email address, phone number, name, date of birth, citizenship, address; identity document, photos and videos for identity verification; questionnaire answers; information on the source of funds; support requests.

2.2. Data on the use of the Platform: wallet addresses and blockchain transactions, balances, orders and trades, deposits and withdrawals, including those made through payment terminals; IP address, device, browser, time and actions on the Platform.

2.3. Data from third parties: results of identity and transaction checks from providers, information from the payment agent on deposits and withdrawals through terminals, information from public sources and sanctions lists.

## 3. Purposes of Processing

3.1. The Company processes data to:

- register the User, provide sign-in and protect the account;
- provide the services of the Platform;
- verify Users and transactions, and counter fraud, money laundering and terrorist financing;
- comply with the law and with requests of government authorities;
- answer requests and send notifications;
- analyse and improve the Platform;
- protect the rights and interests of the Company, including in disputes.

3.2. The Company may send the User messages about the Platform. The User may opt out of marketing messages by writing to support@megabit.kg. Notifications on security, transactions and changes of documents are sent to all Users.

## 4. Data Transfer

4.1. The Company does not sell personal data.

4.2. The Company may transfer data to the extent necessary to provide its services: to identity verification and transaction analysis providers; email, SMS and support providers; the payment agent servicing the terminals; hosting, website protection and analytics providers; consultants and auditors of the Company.

4.3. The Company discloses data to government authorities and courts upon their request or as required by law, and where necessary to protect the rights of the Company, Users or third parties.

4.4. The servers and some of the providers are located outside the Kyrgyz Republic, including in countries where the level of personal data protection may differ.

## 5. Cookies and Analytics

5.1. The Platform uses cookies for sign-in, security, saving settings and analytics. The website uses Google Analytics and Yandex Metrica.

5.2. Cookies can be disabled in the browser settings. Without them, sign-in and some functions of the Platform are not available.

## 6. Storage and Protection

6.1. Data is stored while the account exists. Data of the verification of the User and of their transactions is also stored after the account is closed: for the period required by the law on countering money laundering and terrorist financing, and for the period necessary to protect the rights of the Company.

6.2. The Company takes reasonable organisational and technical measures to protect data. The risks of transferring data over the Internet cannot be fully excluded. The Company is not liable for access to data that occurred through no fault of its own, including through the fault of the User or third parties.

## 7. Rights of the User

7.1. The User may request information about their data, its correction or deletion, and may withdraw their consent to processing by writing to support@megabit.kg from the email address of the account.

7.2. Withdrawal of consent or a request to delete data means the closure of the account. Data that must be stored by law or that is needed to protect the rights of the Company is deleted at the end of its storage period.

## 8. Final Provisions

8.1. The Platform is not intended for persons under 18.

8.2. The Company may change this Policy unilaterally. The new version takes effect upon its publication on megabit.kg.

8.3. If the Russian and English versions of this Policy differ, the Russian version prevails.