



PRIVACY POLICY

Background

Satoshi Systems understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits our websites, (<https://www.satoshi.ltd/>) ("Our Sites") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

"Account" means an account required to access and/or use certain areas and features of our sites;

"Cookie" means a small text file placed on your computer or device by our sites when you visit certain parts of our sites and/or when you use certain features of our sites; and

"Cookie Law" means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

2. Information About Us

Our Sites are owned and operated by Satoshi Systems Ltd.

Registered address: Level 39, One Canara Square, Canary Wharf, London E14 5AB, United Kingdom

Email address: info@satoshi.ltd

Telephone number: +44-7957165001

Postal address: Level 39, One Canara Square, Canary Wharf, London E14 5AB, United Kingdom

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of our sites. Our sites may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

4. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Clause 13.
- b) The right to access the personal data we hold about you. Clause 12 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Clause 13 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Clause 13 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.

g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.

h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

i) Rights relating to automated decision-making and profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Clause 13. It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau. If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

We would welcome the opportunity to resolve your concerns ourselves. However, please contact us first, using the details in Clause 13.

6. What Data Do You Collect and How?

We may collect the following information about you:

Basic Information: We may collect your personal information like name, email address, and location.

Analytics Information: We may collect information such as your IP address, traffic and location data and information about your use of our sites; If you send us an email, we may collect your name, your email address, and any other information which you choose to give us.

Financial Information: If you enter into a contract with us, we will collect your bank details for financial settlement;

The lawful basis under the Data Protection Legislation that allows us to use such information is Article 6(1)(f) of the GDPR which allows us to process personal data when it is necessary for the purposes of our legitimate interests, in this case, the delivery of services to you pursuant to a contract.

If you contact us as described above, you will be required to consent to our use of your personal data to contact you. In this case, Our lawful basis for using your personal data will be Article 6(1)(a) of the GDPR, which allows us to use your personal data with your consent for a particular purpose or purposes.

7. How Do You Use My Personal Data?

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the GDPR at all times.

Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests.

Specifically, we may use your data for the following purposes:

- a) Providing and managing your Account;
- b) Providing and managing your access to Our Site;
- c) Personalising and tailoring your experience on Our Site;
- d) Supplying Our products to you (please note that we require your personal data in order to enter into a contract with you);
- e) Personalising and tailoring Our products for you;
- f) Replying to emails from you;
- g) Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by selecting the 'unsubscribe' option on the emails);
- h) Market research; and

i) Analysing your use of Our Site and gathering feedback to enable us to continually improve our site and your user experience.

With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by email with information, news and offers on our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it.

8. How and Where Do You Store or Transfer My Personal Data?

8.1 We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows.

8.2 We will only transfer your personal data to third countries whose levels of data protection are deemed 'adequate' by the European Commission. More information is available from the European Commission.

8.3 Where we transfer your data to a third party based in the US, the data may be protected if they are part of the EU-US Privacy Shield. This requires that third parties to provide data protection to standards similar to those in Europe. More information is available from the European Commission.

8.4 Please contact us using the details below in Clause 13 for further information about the particular data protection mechanisms used by us when transferring your personal data to a third country.

8.5 Personal data security is essential to us, and to protect personal data, we take the following measures: limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that

they are subject to duties of confidentiality; procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so; we maintain industry standard firewalls and SSL certificates for all of our sites.

9. Do you share my personal data?

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Clause 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. How Can I Control My Personal Data?

In addition to your rights under the Data Protection Legislation, set out in Clause 5, when you submit personal data via our sites, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails, at the point of providing your details and by managing your Account).

11. Can I Withhold Information?

You may access certain areas of our sites without providing any personal data at all. However, to use all features and functions available on our sites you may be required to submit or allow for the collection of certain data. You may restrict our use of Cookies. For more information, see Clause 13 and our Cookie Policy.

12. How Do You Use Cookies?

Our sites may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. You may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. We use Cookies to facilitate and improve your experience of our sites and to provide and improve our products and services. In addition, our sites use analytics

services provided by Google which also use Cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how people use our sites.

For more details, please refer to our **Cookie Policy**

13. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, please use the following details;

Email address: info@satoshi.ltd

Telephone number: +44-7957165001

Postal address: Level 39, One Canara Square, Canary Wharf, London E14 5AB, United Kingdom

14. Changes to This Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. Any changes will be immediately posted on our sites and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our sites following the alterations. We recommend that you check this page regularly to keep up-to-date.