

## **PRIVACY POLICY**

### **What is Personal Information?**

This Policy applies to the personal information of Netcoins's customers, partners, resellers, and other individuals we deal with. This Policy does not apply to personal information of our employees or employee applicants, or to information that is not personal information.

When we say "Information" we are referring to information that is about you that applicable law classifies as personal information. It does not include information that is anonymous, aggregated, or is no longer identifiable to a specific person.

In order to use our service you, the User, may be required to provide certain information including, but not limited to: Name, email address, phone number, physical/ mailing address, IP address, banking information, and identity documents. This information constitutes your "personal" information

### **Why?**

We collect Information for the purposes of managing and administering our business and to ensure we comply with [Canadian](#) and international law(s). This includes enabling us to verify your identity and approve you in order to receive Bitcoin and other crypto currencies. We may collect Information directly from you or from third parties with your consent or as permitted or required by law. These third parties include credit bureaus, email and mobile phone providers, and others.

### **What?**

Information we collect includes, but is not limited to:

- Name, address, email address, telephone number, mobile phone number and other contact particulars;
- Bank account information, including bank account, transit and branch numbers;
- Credit history and financial and identity information from consumer and credit reporting agencies, or financial institutions or businesses that you currently have, or have had, financial dealings with;
- Income information, including the name and contact information of your employer or other source of income;
- Name and contact information of personal references;
- Banking information collected from your physical or online bank statements;
- Information we collect automatically when you visit our website (see “Cookies and Interest-Based Advertising” below);
- Information we collect from public sources and third parties in order to locate you where a debt is owed to us and we are unable to contact you using the information we have on file; and
- Other information with your consent or as permitted or required by law.

### **How?**

We’re transparent about how we collect, use, disclose, and safeguard Information in connection with our business in Canada.

We may use your Information:

- to open, maintain, service, process, analyze, audit, and collect on an account;
- to communicate with you in respect of your Netcoins service;
- to enforce the terms of the services you have obtained from us;
- to verify the information you provided to us;
- to protect you and us from theft, fraud, and unauthorized access to your account;

- to assess your ongoing needs for Netcoins services;
- to inform you of special promotions or products (see “How We Use and Share Information for Marketing Purposes” below);
- for other purposes with your consent or as permitted or required by law.

We may also exchange personal information with our affiliates as necessary for the purposes described above.

You may contact us at any time at [privacy@netcoins.ca](mailto:privacy@netcoins.ca) or [compliance@netcoins.ca](mailto:compliance@netcoins.ca) for any queries you may have regarding this policy and our use of personal information thereby.

### **When?**

The following are examples of when we may use your Information:

-Consumer and Credit Reporting Agencies

We may exchange Information on an ongoing basis with consumer and credit reporting agencies. This is so they can verify your Information, ensure the completeness of the Information they and we have on file about you, maintain the integrity of the credit granting system, and cooperate with local, provincial and national authorities in order to protect you and us from fraudulent transactions.

-Affiliates

We may disclose Information to our affiliates for internal audit, management, billing or administrative purposes including defending and bringing legal actions. We may transfer Information to outside agents or service providers (including our affiliates acting in this capacity) that perform services on our behalf. For example mailing, call centre,

billing, collections, skip-tracing, marketing, analytics, information technology and/or data hosting or processing services or similar services, or otherwise to collect, use, disclose, store or process Information on our behalf for the purposes described in this Policy.

Some of these service providers may be located outside of Canada, including in the United States, and as a result your Information may be processed outside of Canada for the purposes described in this Policy. Reasonable contractual other measures we may take to protect your Information while processed or handled by these service providers are subject to applicable Canadian and foreign legal requirements, including lawful requirements to disclose personal information to government and national security authorities in certain circumstances.

-Legal

We may disclose your Information as necessary to meet legal, regulatory, industry self-regulatory, insurance, audit, and security requirements, and otherwise with your consent or as permitted or required by applicable law (including foreign law applicable to our service providers)

## **HOW WE USE AND SHARE INFORMATION FOR MARKETING PURPOSES**

### **Marketing purposes**

We may use your Information in order to identify your preferences, determine your



eligibility for special offers and discounts, and to contact you in regard to such offers and discounts, or to provide other information about our products, services, promotions and events.

We may share your Information, including contact information and credit and financial information, with our affiliates for the purposes of developing and promoting new or joint products, improving existing products and services, and contacting you to offer products and services that may be of interest to you.

### **Opt-out**

If you no longer want us to use or share your Information for marketing purposes, as described above, please contact us by email (see contact information below): To opt out of our e-mail communications, you may click the unsubscribe link at the bottom of the email message or email [privacy@netcoins.ca](mailto:privacy@netcoins.ca) with the word "Unsubscribe" in the subject line.

### **Cookies and Interest-Based Advertising**

When you visit the Netcoins website, we may collect and use your internet protocol address to help diagnose problems with our server and to administer the website, to identify users and their activities on the Netcoins website, and to gather broad demographic information.

We may also use "cookies", a technology that installs a small amount of information on a website user's computer to permit our website to recognize future visits using that computer. Cookies enhance the convenience and use of our website. For example, the information provided through cookies is used to recognize you as a previous user of our



website, to track your activity on our website, to respond to your needs, and to otherwise facilitate your experience on our website. You may choose to decline cookies if your browser permits, but doing so may affect your use of our website and your ability to access certain features of our website or engage in transactions through our website.

Netcoins also uses web cookies and pixel tags to track user behaviour on our websites and to compile reports regarding user demographics, website traffic patterns, and website purchases. We may then provide these reports to advertisers and others. We may also use other automated tracking technology or methods on our website to enhance the user experience.

## **YOUR CONSENT**

Netcoins collects, uses and discloses your Information with your consent, or as permitted or required by law. Generally, by providing us with your Information, we will assume that you consent to our collection, use and disclosure of such Information for the purposes identified or described in this Policy, if applicable, or otherwise at the time of collection.

We may be required or permitted under statute or regulation to collect, use or disclose Information without your consent, for example to comply with a court order, to comply with local or federal regulations or a legally permitted inquiry by a government agency, or to collect a debt owed to us.

You may withdraw your consent to our collection, use and disclosure of your Information at any time, subject to contractual and legal restrictions and reasonable notice. We will let you know the consequences of refusing or withdrawing consent. Note that if you



withdraw your consent to certain uses of your Information, we may no longer be able to provide certain of our products or services.

Netcoins takes individual privacy and security seriously. By using our service you acknowledge and agree that we may use the following information to validate your identity according to Canadian and international law: name, address, email address, phone number, account number(s), IP address, identity documents, and other information. In order to validate your identity and provide you with service we will securely compare the information you submit to information held by credit bureaus, mobile service providers, and your bank. Note that this transmission, comparison and validation is only done with your consent. Individuals that wish to have their information deleted or be exempt from automated screening may contact [compliance@netcoins.ca](mailto:compliance@netcoins.ca).

## **STORAGE AND DESTRUCTION**

We will store any and all information collected under this policy for a period of 7 years or the lifetime of your relationship with us, whichever is shorter. Note that information that is collected and validated to fulfill our obligations to identify you under the law may be retained indefinitely. If you wish to have your personal information removed or redacted in our system please contact [compliance@netcoins.ca](mailto:compliance@netcoins.ca).

Additionally, note that where we utilize a vendor or software system to validate personal information you disclose to us during registration and operation of your account this information may be stored outside of Canada.

## **OFFICE OF THE PRIVACY COMMISSIONER OF CANADA**

Users may contact the Office of the Privacy Commissioner of Canada at any time via their website at <https://www.priv.gc.ca>.

### **POLICY UPDATE**

This Policy may be revised from time to time. If we intend to use or disclose personal Information for purposes materially different than those described in this Policy, we will make reasonable efforts to notify affected individuals, if necessary, including by posting the revised Policy on our website at [netcoins.ca](http://netcoins.ca). We encourage you to visit this website frequently to obtain the current version. Your continued provision of personal Information or use of our services following any changes to this Policy constitutes your acceptance of any such changes. This Policy is effective as of August 31, 2017.