

CB Privacy Policy

This Privacy Policy outlines how we process your personal information, and the principles that we follow when collecting, using, disclosing and protecting your personal information.

Capitalized terms used below, which are not defined herein, have the meaning set out in our Terms of Use. CB may amend this Privacy Policy from time to time. Please visit our website or contact our Privacy Officer as described below, for the most up to date version of this Privacy Policy.

Who Are We?

CB is an online currency brokerage for transactions that involve any digital cryptocurrency available for trade on canadianbitcoins.com and associated websites, API's or mobile applications (the "Platform"), which may include but are not limited to Bitcoin, Litecoin, Ethereum, Ethereum Classic and Dash ("Digital Assets"). The Platform allows users to request the purchase or sale of Digital Assets, and to execute such transactions.

CB, "we", "us" and similar terms as used throughout this Privacy Policy refer to 8159181 Canada Inc., carrying on business as Canadian Bitcoins, and its subsidiaries.

Why Do We Collect Personal Information from You?

We collect your personal information to:

- Establish your identity
- Facilitate your transactions on our Platform
- Protect you and us from error and fraud
- Communicate with you concerning your account, including responding to any inquiries you may submit as well as sending emails to verify Account creation and confirmation of transactions
- Comply with legal and regulatory requirements, including but not limited to anti-money laundering laws

How Do We Collect Your Personal Information?

We collect your personal information at the time you establish your Account, at the time you make changes to your Account (e.g., if you convert from a Basic Account to a Verified Account), and at other times when we communicate with you to administer your Account. We may collect your personal information directly from you or from third

parties with your consent (if required). We continue to collect and update personal information throughout our relationship with you.

For example, we collect your personal information through:

- The Account set-up process
- Social media and other Internet searches
- Your communications with our customer service team
- Your visits to our websites, including canadianbitcoins.com and other related websites. For more information on this, see below under “Our Web Sites”.

We also verify the personal information that you provide to us by checking it against your three (3) year credit file. For greater clarity, we do not collect your credit score or information respecting your credit history.

What Personal Information Do We Collect About You?

Personal information is any information that identifies you, or by which your identity could be deduced. It does not include aggregate or de-identified information that cannot be directly or indirectly linked to you.

The type of information that we collect may vary depending upon whether you have a Basic Account or a Verified Account. Such information may include:

- Name, address, date of birth
- Email address, phone number
- High resolution, colour, scan or picture of a government issued identification document with your photograph (e.g., passport, drivers' license)
- ID Selfie – Picture of you holding your photo ID, with a note that has the date and the phrase “FOR VERIFICATION ON WWW.CANADIANBITCOINS.COM”
- Social Insurance Number
- Banking information, such as bank statement, void cheque, or direct deposit form
- Transaction history

Your photo identification and ID Selfie (if requested) will be collected, used and disclosed only as necessary for the purposes of fraud detection and prevention.

Our Web Sites

Each time you provide any personal information to us through our Platform, you consent to the collection, use and disclosure of such information in accordance with this Privacy Policy.

In addition, each time you visit our Platform, we gather the date, time, browser type, name of the visitor's Internet service provider, the site that referred the visitor to us, any

pages that are requested, and the navigation history and IP address of the visitor. We also use Google Analytics to track your interaction with the Platform, including without limitation, your traffic sources and your activity on the Platform. The foregoing information does not generally contain anything that can identify users personally. If you object to this gathering of information, you should not use or access our Platform. We use this information for our internal security audit log, trend analysis and system administration, and to gather broad demographic information about our user base for aggregate use. This information may be shared with third parties in order to provide services to us or to analyze, store or aggregate the information.

The Platform also uses cookies (small text files which contain a unique identifier that identifies your browser) which allow us to, amongst other benefits, collect information to improve the Platform, store your preferences and settings, and help with sign-in. You can manage your cookie preferences, but please note that if you refuse to allow cookies the Platform or certain features of the Platform may not work.

To the extent that our Platform contains links to other sites, the owners of those sites are responsible for the privacy practices or content of those other sites. We do not endorse and will not be responsible for the privacy practices on third party websites.

How Do We Obtain Your Consent for the Collection, Use and Disclosure of Your Personal Information?

Consent for the collection, use and disclosure of personal information may be expressly given or implied. Your express consent may be given in writing, verbally or through electronic means. Your implied consent may be given through an action you have taken, such as supplying your personal information for a specified purpose.

Upon creating an Account, you provide your consent to the collection, use and disclosure of your personal information in accordance with this Privacy Policy. Consent may be withdrawn by contacting us as described below. If you do not notify us of the withdrawal of your consent, we will consider you to have consented to our continued collection, use and disclosure of your personal information as outlined in this Privacy Policy. Withdrawal of consent to continued collection, use or disclosure your personal information as outlined herein may result in closure of your Account and/or revocation of your authorization to use the Platform.

What Do We Do With Your Information?

Your information will only be used by CB for the purposes outlined above under “Why Do We Collect Personal Information from You?” Your personal information will be accessible to customer support, account verification and IT staff, who have a need to know such information for the purposes outlined above.

Your information is generally stored online, in servers located in Canada. Although we do not transfer your information outside Canada, some of our service providers may do so (as explained further below).

We will not disclose your personal information to any third party, except as set out below.

Third Party Services

There are certain services supplied to us by third parties, which may require that we share your personal information with service providers or allow them access to such information for the same purposes that we collect, use and disclose your personal information, as outlined in this Privacy Policy. For example, we currently use service providers to supply the following services:

- Verification of your personal information against your three (3) year credit history (currently performed by Securefact)
- Data analytics (currently Google Analytics)
- Payment processing (e.g., DirectWorld.net)
- Data security (currently performed by Cloudflare.com)

Please note that the service providers listed above may be changed from time to time, in CB's sole discretion, without advance notification. Some of these service providers, including Cloudflare.com, may transmit your personal information to or route such information through the United States. In the event that your personal information is transmitted to, or stored in, the United States, such information may be accessible by the courts, law enforcement and national security authorities in the recipient jurisdiction.

Dispute Resolution

In the event that you dispute any transaction carried on using your Account, including but not limited to requests for refunds, we will disclose any or all of your personal information to the relevant payment provider for the purpose of facilitating investigation and resolution of such dispute. For the avoidance of doubt, **this may involve disclosure of your photo identification and social insurance number to third parties**. CB is not responsible for any use, disclosure or failure to protect information by such payment providers.

Transactions

We may be involved, from time to time, in transactions to sell all or part of our business or assets or merge with other businesses. Since our customer information may be part of such transactions, we may use or disclose this information to other parties involved in the transaction. In such cases, the information that is shared is limited to what is necessary to accomplish the transaction, and we use contractual measures to protect the information from improper use or disclosure.

Legal Requirements

There are exceptions where we may collect, use or disclose personal information without consent when required or permitted by law.

From time to time, we may be compelled by legal action to release information (e.g., statutory reporting obligation, search warrant, court order, bankruptcy or insolvency proceedings etc.). In certain circumstances, we may also be permitted by law to collect, use or disclose information without the consent of the individual concerned. For example, we may disclose personal information without consent if it is to be used in an emergency that threatens the life, health or security of the individual, or when collecting unpaid amounts owed or owing to us.

We protect your information

We protect your personal information using appropriate physical, technological and organizational safeguards, including but not limited to:

- all connections to the Platform are encrypted using SSL
- all servers are protected by multiple firewalls
- our employees receive training respecting secure and confidential handling of personal information

If you think someone is impersonating CB, there has been a breach of your personal information, you may be the victim of fraud, or your Account credentials may have been compromised, please call us as soon as possible at **613-369-5009**.

Accessing and Keeping Your Personal Information Accurate

We rely upon you to provide accurate personal information about yourself, including any updates to your information. Subject to certain exceptions under applicable law, you may access the personal information about you that is held by us.

If you want to review, verify or correct your personal information, you may contact our Privacy Officer at **privacy@canadianbitcoins.com**. Please be as specific as possible with your request. There is no charge for verifying or correcting your information but, depending on the circumstances, there may be a charge if you want copies of records. We will let you know at the time of your request if there is a charge.

Resolving your questions and concerns

If you have questions or concerns about our Privacy Policy, the handling of your personal information, or CB's privacy or data protection practices, including but not

limited to our use of any service providers outside Canada, please contact our Privacy Officer at privacy@canadianbitcoins.com.

You may also contact our Privacy Officer, as described above, to withdraw consent to continued collection, use or disclosure of your personal information, or to request a copy of the most up-to-date version of this Privacy Policy.

Changes to this Privacy Policy

This Privacy Policy was last updated in July 2017. We will occasionally update this Privacy Policy and revise the "last updated" date appearing in this paragraph.