

BlockBee Privacy Policy Statement

Effective Date: September 10, 2025

This Privacy Policy applies to **Blockbee Inc**, a company registered under the laws of Republic of Panama, with its registered office at Vía España 1280, Edificio Orión, Suite 7D, Panama City, Republic of Panama (“**BlockBee**,” “**Company**,” “**we**,” “**us**,” or “**our**”).

At BlockBee, we respect your privacy and are committed to protecting personal information you provide through <https://blockbee.io/> (the "**Website**"). By “*Personal Information*”, we mean any information which, alone or in combination with other data, enables direct or indirect identification of an individual. Examples include your name, email address, username, contact details, IP address, device ID, and other online identifiers, as well as any sensitive personal data required for specific services.

This Privacy Policy Statement (the "**Policy**") sets out what information we may collect through our Website, how we use this information, and under what circumstances we may disclose the information to third parties.

This Policy applies only to information we collect through the Website and does not cover other sources, such as third-party platforms.

This Policy, together with the Terms and Conditions and all other information provided on our Website, sets forth the general rules and policies governing your use of our Website. Depending on your activities when visiting our Website, you may be required to agree to additional terms and conditions.

Terms not specifically defined in this Policy shall have the meaning ascribed to them in our Terms and Conditions: <https://blockbee.io/terms-conditions>.

By accessing and using the Services, you acknowledge that you have been informed about the processing of your personal data in accordance with this Policy. By continuing to use the Services, you confirm that you have read, understood, and accepted the terms of this Policy.

If you do not agree with the terms of this Policy or wish to restrict the use of your Personal Information as described herein, you should discontinue use of the Services. For assistance with specific data processing concerns, please contact us at legal@blockbee.io.

Please read this Privacy Policy carefully and its entirety.

1. Data Collection & Processing Lawfulness

We collect and process personal data in compliance with applicable law and regulation. We endeavor to ensure that personal data is processed lawfully, fairly, and transparently, adhering to the following legal bases:

1. **Consent:** the data subject has given consent to the processing of their personal data for one or more specific purposes.
2. **Contract Performance:** processing is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject before entering into a contract.
3. **Compliance with Legal Obligation:** processing is necessary for compliance with a legal obligation to which we are subject.
4. **Legitimate Interests:** processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

We collect your personal data directly from you, from third parties operating on our behalf, from cookies and other online tracking technologies; and from publicly available resources (public records and information about you that is openly available on the internet).

2. Data Collection

2.1 Anti-Money Laundering and Counter-Terrorist Financing

We are committed to complying with applicable laws and regulations, including Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) requirements. To meet these obligations, we conduct Know Your Customer (KYC) and Know Your Business (KYB) procedures to verify the identity of our users and business partners.

These procedures are mandatory during account creation and may also be required for transactions exceeding specific regulatory thresholds or under circumstances where enhanced due diligence is necessary.

Data collected for AML/CTF purposes will be retained in accordance with applicable laws. After this period, it will be securely deleted or anonymized unless further retention is required by law.

2.2 Information You Provide

We collect personal information directly from you when you use our Services, create an account, or conduct transactions. This information may include, but is not limited to:

- **For Individuals (KYC):**

- Full legal name.
- Date of birth.
- Address.
- National identification number.
- Passport or government-issued identification.
- Proof of address (e.g., utility bills, bank statements).
- Selfie or live photo for identity verification.
- Biometric data (e.g., facial recognition).
- Additional information required under applicable regulations.

- **For Businesses (KYB):**

- Business registration documents.
- Certificate of incorporation.
- Proof of registered address.
- Ownership and control structure.
- Names and identification of directors, officers, and ultimate beneficial owners (UBOs).

2.3 Information Collected Automatically

When you access the Website or use our Services, we may automatically collect certain technical information about your device and interactions, including:

- Internet Protocol (IP) address.
- Browser type and version.
- Time zone setting and location.
- Browser plug-in types and versions.
- Operating system and platform.
- Device type and other technology used to access our website.
- Time spent on pages and features viewed.
- Site navigation and interaction data.

2.4 Usage Information

We collect metadata about the transactions you perform using our Website or Services. This metadata may include:

- Recipient details (e.g., wallet addresses or names).
- Digital asset amounts and transaction values.
- Timestamps of transactions.

- Metadata about private key usage for authentication or signature purposes.
- Click-stream data reflecting your navigation on the site.

2.5. Cookies & Online Tracking Technologies

We, along with our service providers, use cookies, web beacons, and other online tracking technologies to collect information about your interaction with our platform.

Cookies: Cookies are small data files stored on your device when you visit our website. They help us:

- Collect device information, such as IP address and browser details.
- Track pages or features viewed and time spent on our site.
- Monitor mobile app performance and user interaction with links.

Web Beacons: Web beacons are graphic images placed on websites or emails to monitor user behavior. These tools allow us to track when emails are opened and interactions with website content.

Managing Cookies: You can manage or delete cookies via your browser settings.

2.6. Children

We do not knowingly collect personal data from individuals under the age of 18. Our Services are intended for use by adults only, and we expressly prohibit the use of our Services by minors.

If we become aware that we have inadvertently collected personal data from an individual under the age of 18, we will take immediate steps to:

- Close the user's account.
- Restrict access to our Services.
- Delete or anonymize any personal data collected, unless retention is required by law.

If you believe that a person under the age of 18 has provided us with their personal data, please contact us at legal@blockbee.io so we can promptly address the issue and prevent further access to our Services.

Parental Responsibility: We encourage parents or guardians to monitor their children's online activities and ensure that they do not access our platform or Services.

3. Security and Confidentiality

3.1 Internal Safeguards & Security Measures

Access to Personal Information is restricted to individuals with a legitimate business need or whose duties reasonably require such access. These individuals are authorized to process Personal Information only in accordance with our instructions and are subject to strict confidentiality obligations. Additionally, we implement reasonable and appropriate technical, organizational, and administrative measures to safeguard your Personal Information against unauthorized access, disclosure, alteration, or destruction.

However, while we take reasonable measures to protect your Personal Information, please note that transmission of data over the Internet is not completely secure. Any transmission of Personal Information to us via email or through our Website is at your own risk. Once we receive your Personal Information, we implement strict procedures and use robust security features to minimize the risk of unauthorized access.

If you suspect any unauthorized access to your Personal Information or account, notify us immediately at legal@blockbee.io.

4. Handling Personal Data

We process your Personal Data in accordance with the following principles to ensure lawful, fair, and transparent handling of your information:

- We will only collect Personal Data for specific, explicit, and legitimate purposes. The purposes for which data is collected will be clearly communicated at the point of collection and must align with those outlined in this Policy. Personal Data will not be processed for any purpose incompatible with the original purpose unless explicit consent is provided.
- We ensure that the Personal Data we collect is adequate, relevant, and limited to what is necessary for the specified purpose. Excessive or unnecessary data collection is avoided.
- We do not retain Personal Data longer than is necessary to fulfill the purposes for which it was collected or to comply with applicable legal, regulatory, or contractual obligations. Personal Data retention periods are determined as follows:
 - Legal and Regulatory Compliance: Data required for compliance with laws, such as anti-money laundering, will be retained for the period mandated by applicable regulations.
 - Business Operations: Data required for ongoing business purposes may be retained for a defined period as outlined in agreements or sector-specific requirements.
 - Deletion and Disposal: Once the applicable retention period has expired, Personal Data will be securely destroyed or anonymized.

- We take reasonable steps to ensure that the Personal Data we collect and process is accurate, complete, and up-to-date. Users are encouraged to notify us of any changes to their Personal Data to maintain its accuracy.
- Certain types of data may be retained for extended periods where required by law or for other legitimate reasons, such as resolving disputes or enforcing agreements.

5. Use of Information

We use your personal data for the purposes outlined below. All processing is conducted in accordance with applicable laws and regulations.

5.1 Purpose of Processing

We process your personal data to provide, maintain, and improve our services, ensuring a seamless and functional user experience. This includes delivering the features and functionality of our site and services, which is essential for both our legitimate interests and the performance of the contractual relationship between you and us. Additionally, we may use your personal data for additional internal administrative purposes, such as auditing, troubleshooting, and operational efficiency, which support our legitimate business needs.

We also use your personal data to communicate updates, new services, or features. These communications may be based on the performance of our contract with you, your explicit consent, or our legitimate interest in informing you about relevant services. For billing purposes, we may process your data to collect fees and manage payments, if needed, which is essential to fulfill our contractual or pre-contractual obligations. Furthermore, we are required to process certain data to meet our legal and regulatory obligations under applicable laws.

5.2 Disclosure of Information

To comply with legal requirements or effectively deliver our services, we may disclose your personal data to trusted third parties. These include:

- **Trusted Third Parties:** Our agents, affiliates, and professional advisors who provide essential support such as legal, accounting, or consulting services. Also, Service providers assisting in processing transactions, managing billing, and providing customer support.
- **Third-Party Websites and Services:** Our platform may include links to third-party websites or services not operated by us. These external sites may have their own privacy policies and data collection practices. We encourage you to review these policies before sharing any personal information, as we are not responsible for their privacy practices or content. External sites may collect personal data through cookies, embedded content, or third-party tracking technologies.

- **Business Transfers:** In the event of a merger, acquisition, restructuring, or sale of assets, your personal data may be transferred to the new entity. We will ensure that any such transfer complies with applicable data protection laws and notify you of any material changes to the handling of your personal data.
- **Legal Protection and Obligations:** We may disclose your personal data to comply with legal obligations, such as responding to lawful requests from law enforcement, regulatory, or governmental agencies. Additionally, we may disclose personal data to protect our legal rights, enforce our terms of service, prevent fraud, or ensure the safety and security of our users and platform.

6. Google Analytics

Our website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics helps us analyze website traffic and user interactions to improve the functionality and user experience of our platform. The information collected by the cookies about your use of our website (including your IP address) is transmitted to and stored by Google on servers located in the United States or other locations as determined by Google.

Google uses this information to evaluate your use of our website, compile reports on website activity for us as the website operator, and provide other services relating to website activity and internet usage. In some cases, Google may transfer this information to third parties if required by law or where third parties process the information on Google's behalf. According to Google's policies, your IP address will not be associated with any other data held by Google.

For more details on how Google handles your data, please refer to [Google's Privacy Policy](#). You may also opt out of Google Analytics by visiting the [Google Analytics Opt-out Page](#).

7. Your Rights

You have specific rights regarding your personal data. We are committed to ensuring transparency and providing you with the ability to exercise these rights where applicable. Your rights include the following:

1. **Right of Access:** You have the right to request access to your personal data and obtain information about how and why it is being processed.
2. **Right to Rectification:** If any of your personal data is inaccurate or incomplete, you have the right to request that it be corrected or updated promptly.
3. **Right to Erasure:** You can request the deletion of your personal data when it is no longer necessary for the purposes for which it was collected, or if you withdraw your consent (where applicable). Please note that we may retain certain data if required by law or for other legitimate purposes.

4. Right to Object: You have the right to object to the processing of your personal data under certain circumstances, such as for direct marketing purposes or where processing is based on legitimate interests.

5. Right to Restriction of Processing: You can request that we limit how your personal data is used if you contest its accuracy, object to its processing, or need it retained for legal claims.

While we strive to honor all requests related to your personal data, there may be circumstances where we cannot fully comply. For instance, we may need to retain certain data to comply with legal obligations, resolve disputes, enforce agreements, or protect our legitimate interests. In such cases, we will inform you of the reason for any limitation on your request.

To exercise any of your rights, please contact us at legal@blockbee.io. We may require proof of identity to process your request securely. We aim to respond to all requests within 30 business days, as required by the applicable law.

8. Changes & Amendments

We may update this Policy from time to time to reflect changes in our practices, legal or regulatory obligations, or improvements to our services. While we do not anticipate frequent significant changes, any updates will be posted on this page, and the revised policy will include an updated effective date at the top of the document.

If we make significant changes to this Privacy Policy that affect your rights or the way we process your personal data, we will provide clear notice of such changes. This may include notification through our website, email, or other appropriate communication channels, as required by applicable laws.

We encourage you to review this Privacy Policy periodically to stay informed about how we collect, use, and protect your personal data. Your continued use of our services after changes to this Privacy Policy are made constitutes your acknowledgment of those changes.

9. How to Contact Us

If you have any questions about this Policy, the data we hold on you, or you would like to exercise one of your rights, please do not hesitate to contact us at legal@blockbee.io. We are here to address your privacy-related concerns and assist you with any inquiries.