# Lite**Send**

## PRIVACY POLICY

Joint Data Controllers (hereafter: "Controllers"): Electrocoin d.o.o. Ilica 15, 10 000 Zagreb, Hrvatska OIB: 45841695639

ECD d.o.o.

Na jami 016, Ljubljana, Slovenija OIB: 107047758

Data Protection Officer: Ilica 15, 10 000 Zagreb dpo@electrocoin.hr

## 1. DATA PROTECTION

Litesend is a service that enables fast money transfer through cryptocurrencies in a quick, reliable, and secure manner.

Accordingly, data protection is one of the key elements of our business operations.

The General Data Protection Regulation 2016/679 EU (hereinafter: "Regulation") sets the highest data protection standards, which we fully adhere to.

## 2. PURPOSE AND DATA TYPES

## a) E-mail notice (notification about transaction):

Printout of the standard invoice form and confirmation of the executed transaction

## b) Website - cookies (functionality):

IP address, access frequency, device access info

## c) Sending and recieving:

Crypto amount, fiat amount, country, reciepent's email, sender's email, IBAN and details from the bank transaction in a conventional volume

## 3. LEGALITY

The collection and processing of data by Litesend are based on the legitimate interest of the subject due to the necessity of contract execution or by achieving a prior action necessary for the realization of a contractual relationship and the fulfillment of all legal obligations of the Controllers.

## 4. RETENTION PERIOD

We manage the data for the duration of the contractual relationship or service execution, and no later than the expiration of all legal data retention obligations. In the case of data usage based on consent, we act according to its current status.

The data retention regarding transactions is defined by the statutory period of 1 years.

## 5. RIGHTS

Rights are exercised by contacting the Data Protection Officer within the stipulated response period of 30 days (exceptionally 60, with prior written notice).

In summary, the rights are: access, correction, deletion, restriction of data processing, data portability, objection to personal data processing, objection to automated profile creation, withdrawal of consent, and the right to complain to the supervisory authority.

#### 6. THIRD PARTIES

Our partnership relations with third parties, primarily banks and cryptocurrency exchanges, are defined by cooperation agreements. These are supplemented with a section on data protection, and it is transparently enabled for the user in the system to see which bank facilitates the transaction. Also, the user can see through the interface which bank or exchange carries out the payment and withdrawal according to the selected country.

## 7. PROCESSING SECURITY

When collecting and processing data, we follow the principle of integrated data protection. We have conducted employee education about data protection for the Controllers and aligned our services with all the measures prescribed by the Regulation. Furthermore, the data collection and processing processes are available in the data collection and processing activity records to the supervisory body, and the devices with which we collect and process data are secured with safety measures.

Sensitive documentation is physically protected. Server accesses are logged under a log system. Additionally, we use VPN, firewall, and encryption as per prescribed guidelines.

## 8. IMPLEMENTATION

We collect data in a minimal volume, in line with prescribed purposes, achieving all principles set by the Regulation, while maintaining territorial integrity in data collection and processing. We implement full integrated data protection and pseudonymize parts of the system in line with the records of data collection and processing activities.

By contacting the Data Protection Officer, it is possible to exercise all the rights of the data subject and to access monthly reports and a summary of the Data Protection Impact Assessment, as well as to receive assistance and clarification on any rights or any details of this Privacy Policy.