



COINHOUSE

Personal data protection policy

Coinhouse (including Coinhouse SAS, Coinhouse Custody Services and Coinhouse Payment Solutions) takes your privacy very seriously.

In order to comply with the applicable regulations on the protection of personal data (hereinafter the "**Applicable Regulations**"), in particular the French Data Protection Act of January 6, 1978 (hereinafter the "**LIL**") as amended and the General Data Protection Regulation (EU) of April 27, 2016 (hereinafter the "**GDPR**"), Coinhouse has adopted the following common principles within its Personal Data Protection Policy ("**PPD**"), available on the [Coinhouse.com](https://www.coinhouse.com) website.

Capitalized terms not defined in this PPD are defined in the Coinhouse [Terms & Conditions](#).

Coinhouse is committed to the values that blockchain technology has upheld since its inception, namely the confidentiality and security of exchanges. That's why we pay particular attention to the fate of your personal data ("DCP"), combining the protection of your DCP with the development of quality services to continually improve your experience on our site or app.

In the interests of transparency, this PPD explains how and why we collect DCP and the rights that Customers can exercise over it.

1. Why do we collect DCP?

Coinhouse acts as :

- controller for all services related to the digital assets we provide to you, and
- subcontractor for other specific services, in particular as Trezor's payment services agent, whose privacy policy is available at the [following](#) address.

In order to enable Customers to access all Coinhouse products and services, Coinhouse collects and processes PII when creating and using a Crypto-asset account.

For PCDs collected during your visit to the Coinhouse website, please refer to our section on cookies.

2. What DCP do we process and for what purposes?

We only collect and use PII that is necessary for our business in order to provide you with personalized, high-quality services.

DCP processed	Legal basis	Shelf life
<p>1/ Identification and contact information (surname, first name, place and date of birth, etc.)</p> <p>2/ Identification and authentication data, particularly when using Coinhouse services (technical logs, computer traces, information on terminal security and use, IP address)</p> <p>3/ Tax data (tax number, tax status, country of residence)</p> <p>4/ Family situation (marital status, matrimonial regime, number of children)</p>	<p>Legitimate interest</p> <p>Legal obligation</p>	<p>For the duration of the contract and 5 years after the end of the business relationship</p>

<p>5/ Employment information (job, remuneration, payslip)</p> <p>6/ Various legal documents (deed of assignment, deed of succession, deed of resale of stock market securities)</p> <p>7/Banking, financial and transaction data (bank details, card number, transaction data including information on transfers, investor profile, value of your assets)</p> <p>Purposes? Regulatory information Fight against fraud and LCB-FT</p>		
<p>1/ Data relating to interactions with us (chat, e-mail, telephone) via our site and via our accounts on social networks</p> <p>2/Data relating to the use of products and services subscribed to in connection with banking, financial and transactional data</p> <p>Purposes? Statistical studies Route improvement Route modeling</p>	Legitimate interest	For the duration of the contract and 5 years after the end of the business relationship
<p>1/ Name and surname</p> <p>2/Data relating to interactions with us (chat, e-mail, telephone)</p> <p>Purpose? Assistance to prospects or customers</p>	Execution of pre-contractual measures Legitimate interest	Until consent is withdrawn 3 years maximum
<p>First name, last name, email address</p> <p>Purpose? Newsletters Sales operations</p>	Consent Legitimate interest	Until consent is withdrawn 3 years maximum
<p>First name, last name, e-mail address, telephone number, training course</p>	Consent	2 years from application date

Purpose? Recruitment		
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**Please note that the retention periods will be suspended in the event of any legal action being brought against Coinhouse or members of the company in connection with their duties.*

****For more information on how we handle PCDs as part of our recruitment process, please refer to our page: [//jobs.coinhouse.com/privacy-policy](https://jobs.coinhouse.com/privacy-policy)**

Details of certain purposes :

Execution of pre-contractual measures: Measures prior to the signing of a contract and which facilitate its conclusion, even in the absence of the actual conclusion of such a contract. These measures are only taken on your initiative.

Fight against fraud and LCB-FT: A set of legal and regulatory rules designed to combat tax fraud, money laundering and the financing of terrorism. The opening of an account may be validated or invalidated on the basis of an automated decision by our systems.

Regulatory information: Any information required by law, regulation, etc. to open an account, the refusal of which prevents the account from being opened or leads to its closure.

Route improvement: In order to offer you an ever smoother experience of our services, we are constantly striving to improve our website and application.

3. Can your DCP be disclosed?

In order to comply with our legal and regulatory obligations, we may be required to transmit DCP to the following persons:

- financial authorities, judicial authorities or state agencies, public bodies, when the latter request them on legitimate grounds or in response to a court order,
- certain regulated professions such as lawyers, notaries and auditors.

This disclosure will be made on request and to the extent permitted by regulations.

We may also transfer your PII to the following persons in order to provide you with the products and services you have requested or to evaluate the relevance or effectiveness of our commercial campaigns:

- our subcontractors, partners, principals, agents, intermediaries and insurers, subcontractors and service providers of Coinhouse (Treezor, Braze, AWS) This communication only takes place in the context of processing that pursues one of the purposes described in article 2,
- intermediary distributors and business introducers who put you in touch with us,
- companies that carry out commercial or market research on our behalf.

We audit and document all the organizational and technical measures put in place by our subcontractors.

We systematically check that sufficient security measures are in place to maintain an adequate level of security throughout the data lifecycle.

As a result, we ensure that the personal data we process cannot be read in clear text, and is systematically encrypted. In the absence of the encryption key, the data is inaccessible, even to a foreign judicial or administrative authority.

We also ensure robust contractual guarantees by imposing a Data Processing Agreement (DPA) tailored to our business sector.

4. Is your data transferred outside the EU?

We favor the selection of processors located within the European Union and automatically subject to the obligations of the RGPD. In some cases, processors may be located and/or process certain data outside the European Union ("EU").

In order to protect DCP in the event of international transfers emanating from the EU and in accordance with Articles 45 et seq. of the RGPD, we undertake that such transfers will be based :

- on an adequacy decision issued by the European Commission, recognizing that this country has a level of protection for DCP equivalent to that provided by EU legislation,
- on the conclusion of EU-approved standard contractual clauses, in accordance with Article 46 of the RGPD,
- on the adoption by our co-contractor of binding corporate rules approved by the Commission.

To obtain a copy of these texts or to find out how to access them, please send a written request to our Data Protection Officer by post to Coinhouse - Délégué à la Protection des Données, 14 avenue de l'opéra - 75001 Paris or by e-mail to dpo@coinhouse.com.

5. What about your interactions with us on social networks?

In order to communicate with our active customers, prospects or social network users who might be interested in our services and news, we are present on several social networks.

By accessing these social networking platforms, you are subject to the terms and conditions and privacy policies of these operators. Coinhouse has no control over the processing of your PII by these platforms and cannot be held responsible for their actions.

When you interact directly with us on these social networking platforms, we may process your DCP on the basis of your consent.

6. What are your rights and how can you exercise them?

Under the RGPD regulation, you have the rights to your DCP set out in Articles 12 to 21 of the RGPD.

However, due to our legal obligations and the professional secrecy to which we are bound, exercising these rights is likely to compromise the purposes of the processing concerned. Therefore, your guarantees may be limited in certain situations in accordance with Article 14, 5., b) and d) and Article 17, 3, b) and e) of the RGPD Regulation, Article 48 of the LIL and Articles L. 621-4 and L. 612-24 of the French Monetary and Financial Code.

Apart from these cases, you may at any time exercise your right of access to your personal data, as well as your right to supplement, modify, rectify or delete it, or to object to its processing for legitimate reasons in accordance with the applicable laws on the protection of personal data.

In addition, you may request that the processing of your DCP be limited and, in certain cases, you may request that we transfer your DCP to you (if technically possible and within the limits of Coinhouse's professional secrecy) or to another data controller.

Where the processing of your DCP is based on consent, you have the right to withdraw your consent at any time. Such withdrawal has no effect on the validity of the processing of your DCP carried out prior to the withdrawal. However, such withdrawal may have the effect of terminating your relationship with Coinhouse.

If you wish to exercise these rights, you must send a request with a copy of your identity card, passport or any other form of identification:

- by post to our Data Protection Officer at Coinhouse - Délégué à la Protection des Données, 14 avenue de l'Opéra - 75001 Paris,
- by completing the questionnaire at this [address](#)

We ask you for proof of your identity to ensure that we protect your personal data and do not send it to a third party.

If you contact us to exercise your rights, we will inform you of the outcome of your request within one month of receiving it.

If necessary, this period may be extended by two months, taking into account the complexity and number of requests (Article 12, 3 of the RGPD Regulation). In this case, we will inform you within one month of receiving your request. We reserve the right not to respond to manifestly unfounded or excessive requests. Following the exercise of your request, it will be kept for as long as a recourse is possible.

At any time, if you consider that your rights have not been respected, you can also lodge a complaint with the Commission Nationale Informatique et Libertés (CNIL).

7. How do we protect your DCP?

We take the security of our information systems and the personal data we process very seriously. We implement all necessary technical and organizational measures to ensure the security of our personal data processing and the confidentiality of the data we collect. This implies in particular the implementation of the measures detailed below.

Technical measures

- Systematic data encryption on hosting servers during data transit (between application and servers) and storage;
- Strong password policy when creating a Beneficiary account and captcha to limit attack attempts;
- Setting up a dedicated SOC team to manage incidents, monitor security controls and continuously verify the effectiveness of security measures;
- Implementation of a detection and prevention system.

Organizational measures

- Physical protection of premises and entry control ;
- Connection logging and traceability ;
- Authorization management policy for all personnel who may have access to data;
- Authentication procedures for people accessing data, with personal, secure access via confidential logins and passwords.

8. How can I find out about changes to this PPD?

In a world of constant technological change, we regularly update this information document. We invite you to consult the latest version of this document on our website, and will inform you of any substantial changes via our website.

9. What is our cookie policy?

A cookie, or tracer, is a small computer file deposited and read on the user's terminal, whatever it may be, when browsing our website.

These files enable us to record certain information about your use of our website and our application in order to continually improve your customer experience and to enable you to access certain secure areas of the Site.

We may use the following types of cookies:

- so-called technical cookies, which are used to authenticate the customer to the service, to ensure the security of the authentication mechanism, and which are therefore strictly necessary for the operation of the Site;
- audience measurement cookies, which enable us to compile statistics for analyzing the number of visitors to our site.

The use of these cookies may lead to the collection of DCP, which is why you can manage cookies via the banner that appears when you visit our Site.

On your first visit to our Site, a banner will be displayed allowing you to select the cookies you wish to accept, to accept all of them or to refuse all of them, with the exception of cookies required for the proper operation of the Site. You can reverse your choice at any time by clicking on the "*Set your cookies*" tab displayed at the bottom of the page on our website.

10. How to contact us

If you have any questions about the use of your personal data as described in this document, please contact our Data Protection Officer:

- by post to Coinhouse - Délégué à la Protection des Données, 14 avenue de l'opéra - 75001 Paris,

or

- by e-mail to dpo@coinhouse.com, who will process your request.