bitpanda



Bitpanda Custody MENA FZCO

Privacy Notice

Bitpanda Group Privacy Notice

The current version of this Privacy Notice is: July 2026

1. About this Privacy Notice

Privacy and the security of transactions are core elements of cryptocurrencies, blockchain technology and its whole global movement. Bitpanda really appreciates the trust Users (hereinafter referred to as "User/s" or "you") have in us when trading cryptocurrencies and other digital assets on our platform.

For this reason, privacy and data security have an enormously high priority for the global Bitpanda Group. It is very important to us that you feel safe during your visit to our website and while using our services as well as over the course of all other business transactions with us. As soon as you make use of products and/or services of Bitpanda, you entrust us with the processing of your personal data. Bitpanda wants to give you the best possible experience with our platform to ensure that you enjoy the usage of our products and services now and in the future. That's why we want to understand the User behaviour on our platform in order to continuously improve it.

Therefore, in this Privacy Notice, we want to transparently inform you which personal data we collect from you and why and who might receive it. Furthermore, we would like to inform you which precautions we take to protect your personal data, which rights you have in this context and to whom you can turn for data protection concerns.

Regarding the terms used in this Privacy Notice, such as “Processing” or “Controller”, we refer to the definitions of the GDPR. References to 'GDPR' in this notice shall, where applicable, be interpreted as references to the relevant data protection legislation in the user's jurisdiction, including the UK GDPR and the UAE PDPL, where applicable.

For our Swiss customers solely: for definitions of terms relevant under applicable data protection law, such as "personal data", "processing", etc., we refer to the respective data protection laws, in particular the Swiss Data Protection Act (Federal Act on Data Protection (FADP); SR 235.1) and the Data Protection Ordinance (Ordinance to the Federal Act on Data Protection (OFADP); SR 235.11) and, to the extent applicable, the General Data Protection Regulation of the European Union (GDPR).

For United Kingdom (UK) based users: Wherever "GDPR" and its provisions are referred to in this privacy notice, such references shall be interpreted as referring to the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, together with their applicable provisions, as they apply to users located in the United Kingdom.

For United Arab Emirates (UAE) based users: For users located in the United Arab Emirates, the applicable data protection law is the Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (PDPL). Accordingly, any reference to "GDPR" and its provisions in this privacy notice shall be interpreted as referring to the PDPL and its applicable provisions, as they apply to users in the UAE.

This Privacy Notice is drafted in English and German. In case of conflict the English version shall be the binding version.

2. Applicability

To whom does this Privacy Notice apply?

Bitpanda GmbH and its direct and indirect subsidiaries (hereinafter referred to as "Bitpanda" or "Bitpanda Group" or "we") offer via its websites (e.g.: www.bitpanda.com, exchange.bitpanda.com) and its mobile applications (“Mobile App”) (together hereinafter referred to as "Website" or “Platform”) services and products related to buying and selling cryptocurrencies and other digital assets as well as payment and IT services.

This Privacy Notice applies to all services and products regarding our Platform, our Broker together with associated products, this website and our Helpdesk; and provides an overview in regards to the main actors when providing our Platform.
Users of the Bitpanda Card might also want to have a look at the Privacy Policy of TransactPay, which issues the cards.

Further descriptions of the provided services and the legal entities providing them can be found in Section 4 of the Bitpanda Group General Terms and Conditions. In order to keep this Privacy Notice neat and easy to read, we want to provide a brief overview (the specifics will depend on the User's location and the used product). Concerning our Platform, the following entities are the "main actors":

- Bitpanda GmbH: has its business address at Stella-Klein-Löw Weg 17, 1020 Vienna, Austria, registered in the commercial register of the Commercial Court of Vienna under FN 569240 v and is the content provider of the Platform as well as responsible for the offer of cryptocurrencies on it;
- Bitpanda Group AG, with its registered address at Hardstrasse 201, 8005 Zürich, Switzerland registered in the commercial register of the Commercial Court of Zürich under CHE-267.250.666
- Bitpanda Metals GmbH: has its business address at Stella-Klein-Löw Weg 17, 1020 Vienna, Austria, is registered in the commercial register of the Commercial Court of Vienna under FN 511923 d, and offers trading with precious metals via the Platform;
- Bitpanda Payments GmbH: has its business address at Stella-Klein-Löw Weg 17, 1020 Vienna, Austria, is registered in the commercial register of the Commercial Court of Vienna under FN 501412 x, and offers different payment services via the Platform;
- Bitpanda Financial Services GmbH: has its business address at Stella-Klein-Löw Weg 17, 1020 Vienna, Austria, is registered in the commercial register of the Commercial Court of Vienna under FN 551181 k and acts as a service provider for the Platform. Bitpanda Financial Services GmbH provides the reception and transmission of orders regarding digital securities in accordance with the Austrian Securities Supervision Act 2018 (Wertpapieraufsichtsgesetz 2018 or "WAG");
- BP Group Services GmbH: has its business address at Stella-Klein-Löw Weg 17, 1020 Vienna, Austria, is registered in the commercial register of the Commercial Court of Vienna under FN 523486 h and acts as a service provider in regards to the Helpdesk for the Bitpanda Group (except for Bitpanda Custody);
- Bitpanda Custody Ltd: has its business address at 21 Holborn Viaduct, London, EC1A 2DY, United Kingdom, is registered under registration number 11625148 and acts as a service provider for crypto custody services called Bitpanda Custody.
- Pantos GmbH has its business address at Stella-Klein-Löw Weg 17, 1020 Vienna, Austria, is registered in the commercial register of the Commercial Court of Vienna under FN

481562 f and is building a decentralised protocol that allows transfer of assets between blockchains.

For users from certain countries or depending on the used services, other legal entities in the Bitpanda Group might be involved as service or content providers, such as:

- Germany: Bitpanda Asset Management GmbH: has its business address at Friedrich-Ebert-Anlage 36, 60325 Frankfurt am Main, Germany, is registered in the commercial register of the Commercial Court of Frankfurt am Main under HRB 121696 and is a service provider for the Bitpanda Group.
- Bitpanda Broker UK Ltd: with its registered office at Atlantic House, Holborn Viaduct, London, EC1A2FG, United Kingdom, registered with the English Financial Conduct Authority (FCA) under number 11412485 and acting as a service provider for crypto broker services in the United Kingdom (Bitpanda UK Broker);
- Bitpanda UK Holding Ltd: with its registered office at Atlantic House, Holborn Viaduct, London, EC1A2FG, United Kingdom, registered with Companies House under number 14923149;
- BP23 Holding Ltd.: with its registered office at 66, Apt. 5, Old Theatre Street, Valletta, VLT 1427, Malta, registered in the Malta Business Register under C 106259.
- BP23 CA Ltd: with its registered office at 66, Apt. 5, Old Theatre Street, Valletta, VLT 1427, Malta, registered in the Malta Business Register under C 106261, and operates as a service provider for crypto brokers and custody services.
- BP23 Pay Ltd: with its registered office at 66, Apt. 5, Old Theatre Street, Valletta, VLT 1427, Malta, registered in the Malta Business Register under C 106323, and operates as a service provider for Electronic Money Institute (EM) services.
- BP23 FA Ltd: with its registered office at 66, Apt. 5, Old Theatre Street, Valletta, VLT 1427, Malta, registered in the Malta Business Register under C 106324, and operates as a service provider for financial investment services;
- BP23 PAN Ltd: with its registered office at 66, Apt. 5, Old Theatre Street, Valletta, VLT 1427, Malta, registered in the Malta Business Register under C 107411, and operates as a service provider for non-custodial wallet services;
- Bitpanda MENA FZCO: with business address Unit No. 1633, DMCC Business Centre, Level 1, Jewellery & Gemplex 3, Dubai, United Arab Emirates, registered in the Dubai Multi Commodities Centre under DMCC199300
- Bitpanda Custody MENA FZCO: with business address Unit No. UT-12-PO-14, DMCC Business Centre, Level 12, Uptown Tower, Dubai, United Arab Emirates, registered in the Dubai Multi Commodities Centre under DMCC199650
- Bitpanda Broker MENA FZCO: with business address Unit No. UT-12-PO-15, DMCC Business Centre, Level 12, Uptown Tower, Dubai, United Arab Emirates, registered in the Dubai Multi Commodities Centre under DMCC199645

- Vision web3 Foundation: with business address Baarerstrasse 12, 6300 Zug, registered in the Commercial Register of the Canton of Zug under CHE-470.746.756.
- Bitpanda Financial Services GmbH (Berlin Branch), with its business address Dircksenstraße 4, 10179 Berlin, Germany, registered in the district court of Charlottenburg under HRB 271190 B.

3. Minors:

Are minors allowed to use Bitpanda's services?

No, the products and services of Bitpanda are not directed to people under the age of 18 years. Only persons of legal age are permitted to use the services of Bitpanda and register for an account. Therefore, we are not knowingly collecting personal data from minors. So, if you are under the age of 18 years, please do not use Bitpanda's platform and do not provide us with any personal data.

4. Controller:

Who is responsible for the data processing and who can you contact?

Bitpanda is aware that both the protection and the careful handling of your personal data are very important. Bitpanda will solely use the Personal Data provided by you in compliance with the applicable data protection laws and this Privacy Notice.
Generally, each company of the Bitpanda Group is a Controller pursuant to Art 4 para 7 GDPR and therefore responsible for the processing of personal data in connection with the services provided by the specific company (for the different services see Point 2). In some cases, entities of Bitpanda might act as Processor pursuant to Art 4 para 8 GDPR on behalf of each other.
Due to the high data security standards in the Bitpanda Group, Bitpanda considers it necessary to implement a group-wide uniform data protection strategy. Thus, Bitpanda GmbH acts as a central point of contact for all data protection issues concerning all services offered by the Bitpanda Group via the platform or the Mobile App.
If you have any questions in connection with the processing of your personal data and the exercising of your rights under GDPR, you can contact our Helpdesk under this Link. Please note that for certain requests, we require further identification data from you (e.g. Passport, ID card, etc), in order to ensure that your personal data is only shared with you.

Joint Controllers

If Bitpanda Group acts together with other parties as Joint Controller (e.g. processing data for jointly determined purposes within the Bitpanda Group), we provide those parties with personal data if applicable and based on at least one of the legal bases listed under Point 7. In case of a joint controllership, we transmit your personal data only based on a sufficient agreement with our partners (Art 26 GDPR). However, no sensitive payment data will be transmitted within the Bitpanda Group.

Bitpanda will only share your personal data with other third parties if a legal basis applies. This may be due to our contract with you, our legitimate interests, a legal obligation or your prior consent (withdrawable at any time).

5. Payment Initiation Services and Financial Services:

How is my personal data processed if I use payment initiation and financial services?

This Privacy Notice also sets out the more specific data protection information in regards to Bitpanda GmbH's subsidiaries such as Bitpanda Payments GmbH (provides different payment services via the platform) and Bitpanda Financial Services GmbH (service provider for the reception and transmission of orders regarding digital securities in accordance with the Austrian Securities Supervision Act 2018 - Wertpapieraufsichtsgesetz 2018 or "WAG").

When you use our payment initiation services, we will only process your personal data with your consent or due to a contractual obligation towards you and we will not request any data from you other than those necessary to provide this service. Furthermore, we won't use, access or store any data for purposes other than for the performance of the payment initiation service as explicitly requested by you. All personal data which is necessary to provide the payment service (especially your security credentials) is not accessible by any other party other than Bitpanda Payments and only transmitted by us through safe and efficient channels. After the performance of the service Bitpanda Payments will not store your sensitive payment data.Bitpanda Payments offers the following services (hereinafter referred to as "payment services"):

- Payment Transfer Services: services for the execution of payment transactions, including the transfer of funds to a payment account with Bitpanda Payments or with another payment service provider (e.g. direct debit transactions, payment card transactions, credit transfer transactions).

- Money Remittance Services: services where funds are received from a payer, without any payment accounts being created (in the name of the payer or the payee), for the sole purpose of transferring a corresponding amount to a payee or to another payment service provider acting on behalf of the payee, or where such funds are received on behalf of and made available to the payee.
- Payment Initiation Services: a service to initiate a payment order at the request of the payment service User with respect to a payment account held at another payment service provider.
- E-Money Services: issuance and redemption of electronic money within the meanings of section 1 para 1 of the E-GeldG ("E-Money") including the administration of the related e-money wallets.

When you use our financial services, we will only process your personal data with a valid legal basis (Art 6 GDPR) and we will not request any data from you other than those necessary to provide this service

Financial Services offers the following services (hereinafter referred to as "financial services"):

- Acceptance and Transmission of Orders: When accepting and transmitting orders, Financial Services brings the Users together with the Product Manufacturer or a trading platform insofar as it forwards the Users order for the execution of a certain transaction to the Product Manufacturer or a trading platform.

6. Data categories and sources:

Which personal data do we process and from which sources does the data originate?

We process the personal data that we receive from you within the scope of the business relationship and your usage of our Website or Mobile App (Platform) and payment services. Furthermore, we might process data we receive within the Bitpanda Group and data we have received from credit agencies, debtor directories, business analysis providers (e.g. Credit Information Services, Business and financial information companies, Security companies, etc..), and from publicly accessible sources (e.g.: commercial register, register of associations, land register, media, sanctions lists).

When using Bitpanda's services or interacting with Bitpanda, the following personal data might be processed:

- Contact and general account creation data: when creating a new User account or communicating with Bitpanda, we might process for example: name, address, telephone number, email, date of birth, photo for the account, etc.;
- Verification data: when an account is verified, we might process for example: screenshots/photos of national identity documents (e.g.:passport, driving licence, ID card) and identification data from these documents, utility bill details for residence verification, data about status of politically exposed persons, video data from the video authentication process, biometric data for verification (see point 7), etc.;
- Financial data for facilitation of transactions: e.g.: bank details (IBAN, BIC), payment service provider information, payment details, transaction-ID, and other sensitive payment data. In addition, data relating to the placing of orders for financial instruments (number of units purchased, amount, time of acquisition/termination and similar) will be processed.
- Log data on the website: e.g.: IP-address, transaction data, deposit and withdrawal address, computer or mobile device information, frequency, time, operating system, browser type, device type, unique device identification number, identification cookies (e.g. for the Affiliate and Tell-a-Friend programme), optionally form data, crash reports, performance data, interactive chat (for Bitpanda Custody), third-party cookies, etc.;
- Mobile app data: e.g.:IP-address, transaction data, deposit and withdrawal address, mobile device information, frequency, time, operating system, browser type, device type, unique device identification number, optionally form data, crash reports, performance data and only with your explicit consent, data from: camera, microphone, storage, telephone (read SMS confirmation);
- Company details in case of business accounts and you use payment services we might process for example:commercial register reports, data of/or concerning beneficial owners, records or additional information on recent, past or planned business activities, other data necessary to determine/validate the structure, the beneficial ownership or any power of attorney of the company.
- Business onboarding data: e.g.: KYC company data, ultimate beneficial ownership (UBO), legal entity type, PEP status of UBOs, Country of Incorporation, VAT and registration Number, Financial Statement Data, Shareholder data, Authorised individual data (which might include personal data of an individual such as name, ID number, ID type, issuing authority, email address, phone number).
- Details to and proof of funds, if necessary: e.g.: banking statements or any other details provided by banks or financial institutions, contracts of sales or contracts in general, or any other suitable data to prove or determine the origin of funds, if exceeding the daily/monthly or general limits on Bitpanda or upgrading to Bitpanda Club “High Limit Service or OTC Service” (more info see https://www.bitpanda.com/en/bitpanda-club).

In order to determine User's purpose for using the above-mentioned services or trading volume additional information on recent, past or planned business or personal activities of business or private Users or other data to determine the User's intentions, if necessary, can be processed, as requested by Bitpanda or provided by the User;

- Personal data provided by you in requests to our Support or other employee; if you contact our support, we might process for example: data provided in your request to the support team.
- Marketing data: if you visit our website or social media sites or during the usage of the Mobile App, we might process statistical and marketing data for example: number of visitors, frequency, clicks, time, places, target groups, data from cookies and similar technologies, consumer's behaviour, interests and preferences, data about market research and target groups surveys, etc.; for social media see also point 11 and for cookies our Cookie Policy.
- Research data: if you, inter alia, participate in any discussion boards, panels, etc. provided by Bitpanda or take part in one of our research initiatives and provide data via forms (which you might receive separate information about if you voluntarily agree to participate);
- Photo, video and audio data from events or fairs or interviews: e.g.: photo, video and audio data.
- Recordings of telephone conversations and electronic communication: Pursuant to section 33 of the Austrian Securities Supervision Act (WAG), Financial Services is required to keep recordings of telephone calls and electronic communications at least in relation to transactions carried out in trading for its own account and the provision of services relating to the acceptance, transmission and execution of User orders. We will inform you of this in advance. It should be noted that orders are only accepted via the platform and not via telephone or email (does not apply to Bitpanda Wealth Customers).
    - For Bitpanda Wealth Users telephone calls and communications might be recorded with relation to execution of User orders given and accepted via a telephone call.
- Data concerning experience and investing which is derived from Cash Plus appropriateness test. In particular, knowledge and previous experience with investing including information on the nature of service, transactions and financial instruments with which the User is familiar; the nature, size and frequency of transactions using financial instruments carried out by the User, educational background and occupational or previous professional experience.
- Metadata in connection with purchase of the Steelcoin Asset. This data is not personal data and cannot be used to or lead to re-identifying a person, will be sent to Steelcoin for statistical purposes. Eg.:

    - Anonymised_user_id, transaction_id, timestamp, order status, cryptocoin_name (Steelcoin), type of transaction, transaction amount in quantity, asset price, transaction amount in EUR.
- Further User identification information in the sense of the Austrian Financial Market Anti-Money Laundering Act ("FM-GwG") is also obtained during the initial registration process.
- Data provided by you in connection with the voluntary use of Coach: AI based Coach uses a Large Language Model, in particular, ChatGPT to formulate and provide dynamic answers. Users shall refrain from sharing any sensitive and personal data while using the provided feature. The data provided might be processed in the United States. The following pieces of information might be processed to tailor future conversations to the user:
    - Users financial Goals
    - Users risk tolerance
    - Specific assets or markets of users interest
    - Any particular investment strategy or preferences
    - Other financial or investment information provided by the user
- Data collected in connection with participating in the Fusion Incentive
    - Such as proof of VIP status, full name, email associated with Bitpanda account and current VIP status on the eligible exchange
- Data collected with the use of Bitpanda DeFi Wallet: full name, e-mail address, IP-address, contact and financial information associated with Bitpanda Account.
    - IP address data provided in connection with usage of Exodus function as part of Bitpanda DeFi Wallet
- Hashed data collected in connection with the usage of Crypto Pay by Bitpanda service.
    - Hashed Bitpanda User data associated with Bitpanda account, such as doB, name, surname
- Data as required to be provided under DAC 8 Directive: Full name or entity name, address, country of tax residence, tax number(s), date of birth/incorporation.
- Data necessary for real stock provision under the Common Reporting Standard (CRS)
- Data Provided in the context of Bitpanda Labs initiative: such as feedback, name, email
- Browser and device information; mouse movements and scropp pattern timing; IP address and captcha identifiers
- Customer support related data such as data obtained through call back and Whatsapp support channels
- MT4RS eligibility and product-access data: e.g. MT4RS eligibility and product-access flags, acceptance of terms and conditions and risk-warning acknowledgements;
- MT4RS appropriateness questionnaire data: e.g. your answers, resulting score/status, completion timestamp and historical answers;
- Margin position and margin history data: e.g. asset/ISIN, leverage, position size, borrowed amounts (EURCV), accrued funding fees, margin level, liquidation

threshold/price, risk indicator, margin calls, liquidations, repayments and position close/reduce events;

- Spending-power and collateral data: e.g. eligible spot assets, collateral weights/haircuts, portfolio value used as collateral, projected spending power, risk metrics and any resulting restrictions on trading, withdrawals, sends or card transactions;
- Negative-equity and debt data: e.g. debt record, originating position, principal, funding fees, late fees, due date, payment status, debt collection agency (DCA) status, escalation timestamp and collection history.

For Users of Bitpanda Custody only, we want to point out the following specifics:

- The data processed will be stored for a five year period according to the 5th Anti-Money-Laundering Directive (AMLD5).
- The following specific data categories are collected:
    - Blockchain data: your private blockchain key that will be managed and used to verify and carry out transactions you make online through the App/site;
    - Background check data: might also include credit checks.

For users of Bitpanda Financial Services Berlin we would like to point out the following specifics:

- Account data such as: account number, date of opening and closure, first and last name, address, date of birth, will be collected in accordance with Art 24c German Banking Act (Kreditwesengesetzt, KWG), in order to provide that information to the appropriate tax authorities.

7. Purpose and legal basis for using personal data:

For which purposes and on what legal basis do we process your personal data?

All processing is performed in accordance with applicable data protection legislation. This includes, inter alia, the EU General Data Protection Regulation (GDPR), the E-Privacy Directive and the national implementing acts (e.g. the Austrian Data Protection Act). Generally, we process your personal data based on one of the legal bases listed below.
If we ask you to provide any personal data not described in point 7, then such data and the purpose and legal basis for the collection and processing, will be communicated to the User at the point of collecting the personal data.

Additionally we adhere to international standards that help trace and combat illicit activities in the financial sphere, such as those set by the Financial Action Task Force (FATF). We process your personal data

7.1. For the performance of contractual obligations (Art 6 para 1 lit b GDPR):

Processing of personal data might be necessary for the performance of the contract with you or in order to take steps at your request prior to entering into a contract. The following data processing operations, for example, are covered by such contractual obligations:

- general performance of our services, all tasks necessary for the operation, performance and administration of Bitpanda and its platform;
- video authentication process if you register for an account (validation of identity);
- account management (e.g. continuous updating of User data);
- execution of your orders (e.g. payment processing, chargebacks, proof of purchase and selling);
- data processing and data transmission to precious metals vendors for the transferral of ownership of precious metals to you in accordance with your order;
- Users service and support request; (e.g. contacting because of complications, Zendesk)
- performance of the Affiliate programme and the Tell-a-Friend programme;
- application processing and data transmission for the Bitpanda Debit Card (see point 9.4.).
- analysis and improvement of the platform's quality and the general User experience (e.g. performance tracking on the platform);
- recording of telephone conversations for execution of user orders for Bitpanda Wealth;
- to enable participation in the Fusion incentive program.
- To provide real stock product
- provision of the Margin Trading for Real Stocks (MT4RS) product, including margin eligibility and appropriateness assessment, spending-power checks, order execution, margin-level monitoring, margin calls and liquidation.

7.2. For compliance with legal obligations (Art 6 para 1 lit c GDPR):

Processing of personal data might also be necessary for complying with various legal obligations (e.g. 5. AMLD, ZaDiG 2018, GewO 1994, FATF Travel Rule etc.). The following data processing operations, for example, are covered by such legal obligations:

- contract management, accounting and invoicing;
- compliance and risk management;
- Know-Your-Customer measures like video authentication process (validation of identity) and proof of funds;
- monitoring for prevention of fraud, misuse (e.g. for illegal purposes), money laundering and terrorist financing;
- providing information to fiscal criminal authorities in the context of fiscal criminal proceedings or to prosecution in accordance with official orders;
- consultation of credit agencies to determine creditworthiness and default risks.
- appropriateness test.

- transaction information; such as sender's name, account number, location information, recipient's name and account number in order to prevent money laundering and terrorist financing within the means of complying with FATF Travel Rule
- recordings of telephone conversations and electronic communication.
- appropriateness test.
- to provide real stock product
- Account data information and associated personal data for purposes of Art 24c German Banking Act (KWG)

7.3. To protect legitimate interests (Art 6 para 1 lit f GDPR):

Where necessary, data processing might take place beyond the performance of the contract in order to maintain the legitimate interests of Bitpanda or a third party. The following data processing operations are covered by such a legitimate interest:

- prevention of fraud, misuse (e.g. for illegal purposes), money laundering and terrorist financing;
- processing inquiries from authorities, lawyers, collection agencies in the course of legal prosecution and enforcement of legal claims in the context of legal proceedings;
- risk management and risk minimisation e.g. through enquiries to credit agencies, debtor directories or providers of business analysis;
- data transmission within the Bitpanda Group for internal administrative purposes;
- account management and handling general User requests and inquiries;
- testing and optimisation of procedures and models for analysing requirements, business management, product development and direct User engagement;
- process and quality management measures;
- analysis and improvement of the platform's quality and the general User experience (e.g. performance tracking on the platform);
- market research, business management and continuing development of services and products;
- processing statistical data, performance data and market research data via the website, the Mobile App or social media platforms;
- direct marketing and advertising (e.g. performance of marketing strategies, targeting of Users, dispatch of vouchers, advertisement from Bitpanda and its partner companies);
- use of audio, video and photo data from public spaces (e.g. public events, fairs, etc.) for marketing and other representation purposes on our social media channels or our website;
- performance tracking of the Affiliate programme and the Tell-a-Friend programme;
- processing User preferences (e.g. language, region) via cookies on our website (see also our Cookie Policy;
- identification and examination of potentially defective or suspicious business cases and accesses to our websites (e.g. website analysis);

- Payment services (e.g. transfers from your Bitpanda Account to another Bitpanda Account or a third party, initiating payment initiation services at a third party, etc.)
- measures for protecting our Users and Partners, as well as safeguarding network and information security; also measures to protect our employees, Users and property of Bitpanda e.g. through video surveillance (erasing cycle 72 h) and from external data centres and service providers;
- data security and IT-security on our website and safeguarding our network (e.g. prevention of identity theft and defective or suspicious accesses to our websites).
- Processing data for appropriateness test (Cash Plus).
- Recording of telephone conversations for execution of user orders for Bitpanda Wealth.
- For customer support communications an AI based chatbot might be processing customer requests.
- Usage of AI based coach Investor memory: the investor memory stores and processes user activity and information shared with it on the basis of the ChatGPT AI model.
- Data produced in connection with using Bitpanda DeFi Wallet
- Hashed data collected in connection with the usage of Crypto Pay by Bitpanda service.
- For Bitpanda Labs initiative
- For performance of reCaptcha security checks
- For Customer Support related services, including call back and Whatsapp support channels
- recovery of negative-equity balances and other outstanding debt arising from MT4RS, including via debt collection agencies, and related risk management

7.4. Based on your consent (Art 6 para 1 lit a GDPR):

If you have given us your consent to process your personal data, processing will only take place in accordance with the defined purposes and to the extent agreed in the declaration of consent. Given consent may be withdrawn at any time without giving reasons and with future effect, if you no longer agree to the processing. For example, with your consent we are processing data for the following purposes:

- for the use of all functions of the Mobile App (e.g. telephone permission to read SMS confirmation, camera to scan barcodes, microphone for commands, etc.);
- direct marketing and advertising (e.g. User satisfaction surveys, newsletters, sweepstakes and other advertising communications);
- website analysis and tracking for advertising purposes (see also our Cookie Policy);
- certain uses of audio, video and photo data (e.g. commercials, interviews, etc.) for marketing and other representational purposes via various channels;
- auto-ident procedures for verifying your account (validation of identity) (see point 8).
- Bitpanda account data processed in connection with using Bitpanda DeFi Wallet

Please note that the withdrawal of the consent does not affect the lawfulness of processing based on consent before its withdrawal.

7.5. Processing for other purposes:

As a general principle of Bitpanda, we only process personal data for the purposes for which they were collected. In exceptional cases, however, we might process your personal data which we have collected for one specific purpose for another purpose. In this case, we will inform you before the intended processing about this purpose, the period for which your personal data will be stored, the exercise of data subject rights, the option to withdraw consent, the existence of the right to file a complaint with the data protection authority, whether provision of the data was necessary on legal or contractual grounds and what the consequences would be if it were not provided, and whether automated decision-making or profiling is carried out.

8. Special categories of personal data:

Does Bitpanda process special categories of personal data?

This term stems from Art 9 GDPR and includes data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as genetic and biometric data (Art 9 para 1 GDPR). In general, Bitpanda does not process such categories of personal data, with twofold exceptions being for the purposes of identity verification, and fraud prevention as per Art 9 para 2 lit g GDPR and §21 (6) FmGwG the Financial Market Money Laundering Act (FmGwG) respectively.

During your onboarding you may be asked to complete identity verification via auto-ident procedures in which, in addition to the actual verification data (e.g. screenshots of ID documents and identification data from these, residence, status of politically exposed persons, video data, etc.), biometric data (e.g. personal data resulting from specific technical processing in connection with the physical, physiological or behavioural characteristics of a person and enabling the unique identification of a person, e.g. facial images, dactyloscopic data) is also collected. Such processing of biometric data takes place on the basis of your express consent, which you may revoke at any time, and on the basis of substantial public interest as outlined in Art 9 GDPR. Therefore, we also process and store the provided biometrical data on the grounds of public interest for the purposes of fraud prevention (§21 (6) FmGwG).

The biometric data will be processed solely by our service providers and will be erased completely within 3 years after performing the identification. Bitpanda only receives the

positive or negative verification result alongside other verification data and does not process biometric data from Users itself at any time.

9. Recipients of personal data:

Who receives your personal data?

The protection and confidentiality of your personal data is important to Bitpanda Group. Therefore, we transfer your personal data only to the extent described below or within the scope of an instruction at the time the data is collected from you. In addition, personal data that we collect concerning you will neither be sold by us nor otherwise disclosed to third parties and in general limited to the recipients in the following four groups:

9.1. Data transfer within the Bitpanda Group:

Within the Bitpanda Group, your personal data will be shared between companies: if there is a legal basis as described above. This happens for internal administrative purposes to conduct internal administrative activities efficiently. Our employees treat your data with the highest security standards and also only have access on a need-to-know basis. In all these cases only those offices or employees will receive your personal data who need it to fulfil the contractual and legal obligations and legitimate interests.
If a company acts as a service provider for Bitpanda Payments or Financial Services, we contractually oblige this company to ensure the confidentiality and security of your personal data that they process on our behalf.

9.2. Data transfer to Processors

To a limited extent, we also transmit personal information to Processors. Such include, inter alia, service providers for video authentication services, IT services, User support, improvement of our website, monitoring of defective business cases, application management. Processors may only use or disclose this data to the extent necessary to perform services for us or to comply with legal requirements. We contractually oblige these Processors to ensure the confidentiality and security of your personal data that they process on our behalf.

9.3. Data transfer to public bodies and institutions:

We might also transfer your personal data might be disclosed to public bodies and institutions (i) if we are required to do so by law or in the context of legal proceedings, (ii) if we believe that disclosure is necessary to prevent damages or financial loss, or (iii) in connection with an investigation into suspected or actual fraudulent or illegal activities.

9.4. Data transfer to other third parties:

Bitpanda will only share your personal data with other third parties if a legal basis applies. This may be due to our contract with you, our legitimate interests, a legal obligation or your prior consent (withdrawable at any time).

We want to especially highlight other types of third parties that we might have to share data with:

- Card Provider: if you use the Bitpanda debit card, we will send your personal data as required to our partner Marqeta, the card program management and TransactPay, the card issuer. Your personal data might be processed (this may include verification data, contact data and financial data) to issue the Bitpanda debit card;
- Bitpanda-Technology-Solution Partner: if you are a Bitpanda User via one of our Bitpanda-Technology-Solution Partners (please see point 8), we might share personal data with them. Please see their respective Privacy Policies as linked below;
- Payment gateway provider: if you are a Bitpanda Custody User, payments made on the website or via the App are made through such entrusted third party. Such partner will not share your payment card details with Bitpanda and processing is subject to their own privacy policy and terms and conditions;
- Payment Service Providers (PSP); Payment Service Providers act as independent controllers and are independently responsible for processing the personal data of a data subject.
    - For MangoPay privacy statement, refer to MangoPays website: https://mangopay.com/privacy-statement
- Content managing system: the Bitpanda Custody website is hosted in Hubspot who has their own Cookie Policy.
- Virtual Asset Service Providers (VASPs) involved in any monetary transactions.
- Bank Ident Verification Provider Solaris: We might process your data in connection with bank identity verification processes. For more information please see Solaris Privacy Policy.
- OpenAI: In connection with the use of the Coach feature, the data collected during the usage of the feature will be processed by ChatGPT.
- Talos Advanced Trading Services: Bitpanda might transfer data to our White Label Parties such as Talos, aimed at specific subset of users with experienced trading knowledge. To enable Talos to provide advanced trading experience and the services thereof, users agree for the purposes of fulfillment of contractual obligations, to give Talos (and its licensors) access to user materials through the delivery mechanism agreed upon by the parties, in accordance with Talos' technical specifications. During the term, Talos (and its licensors) are granted a limited, non-sublicensable license to use, extract, reformat, manipulate, analyze, summarize, and otherwise derive information from the users solely as necessary and proportionate to provide the Services to user and operate, maintain, and improve the Services.

- In this case, user material relates to all information, data content and other materials in any form or medium submitted, posted, collected, transmitted or otherwise provided by or on behalf of the user, through the services or to Talos in connection with users' use of the services. User materials include trading instructions and liquidity provider credentials.

- Steelcoin Asset Provider: The above mentioned data pieces are transmitted to and processed by Steelcoin for statistical purposes. The data in question does not concern personal data, rather accumulated and anonymised metadata that can not lead to re-identifying a person.
- If you use the services of A-Trust eID-Austria, the provided data (such as verification data and other details provided) will be processed in connection with such usage.
- Exodus Swap: when using Exodus Swap feature available within the Bitpanda DeFi Wallet, Exodus will process your personal data as an independent controller. To know more about Exodus data handling practices, refer to Exodus Privacy Notice.
- Debt collection agency: in negative-equity/debt-recovery scenarios arising from MT4RS, and consistent with our existing dunning process, we may share your personal data with our debt collection partner Merkur Inkasso for the purpose of recovering outstanding amounts.
- **Other third parties**: Bitpanda Group might transfer your personal data to any other person with your consent to the disclosure or the purpose of performing a contract or in order to take steps at the request of the data subject prior to entering into a contract, especially for the performance of payment services to credit institutions and other payment service providers as well as in regard of Bitpanda GmbH and/or Bitpanda Metals GmbH, as far as the disclosure is necessary for the performance of transactions of cryptocurrencies, digital assets or the purchase and sale of precious metals.
    - Financial Services may disclose your personal data to other third parties with your consent to disclosure or for the purpose of fulfilling the contract or at the Customer's request even before the contract is concluded. Any such transfer of data shall take place in particular for the processing of financial services with regard to banks or other payment service providers, as well as with regard to the Bitpanda GmbH, provided that said disclosure is necessary for the implementation of orders.

10. International data transfer:

Is data transferred to third countries or international organisations?

Bitpanda will process your personal data in general within the European Economic Area. In some circumstances it might be the case that it is processed also outside the European

Economic Area. If this is the case, we will rely on appropriate data transfer mechanisms according to Art 44 et seq GDPR. This might be, inter alia:

- an adequacy decision by the European Commission (Eg.: EU-US Privacy Framework);
- standard contractual clauses as published by the European Commission;
- binding corporate rules;

Regardless of where your personal data is processed, it will be processed in accordance with the provisions in the Privacy Notice, including the technical and organisational measures outlined in point 17.

11. Social Media presence:

Is your data processed on social media platforms and who is responsible in such cases?

Bitpanda maintains social media presence on different platforms (see below) in order to communicate with its active Users, prospective Users and interested social media Users about Bitpanda's services, products and other news. For your own use of such social media platforms, the general terms and conditions, as well as the privacy policies and practises (e.g. processing outside of the European Economic Area) of these operators, apply. We would like to point out that User data may also be processed outside the European Union. This can result in risks for Users due to different legal frameworks (e.g. it could make it more difficult to enforce data subject rights).

Social media platforms might track your behaviour (e.g. what content you clicked on or what websites you opened) when you are logged in to your account. To prevent such associations, you may want to log out of your social media accounts. Bitpanda has no control and no responsibility over the general activities of social media platforms and your behaviour and will therefore not assume any liability for damages incurred by them using your personal data. For more information regarding tracking, cookies and similar technologies as well as opt-out possibilities in Bitpanda's own services and associated services, have a look at our Cookie Policy.

Contrary to what was said about the general practices of social media platforms, Bitpanda is responsible for the processing of personal data gathered by communicating directly with us via such platforms (e.g. likes, direct messages, comments). At the same time, this personal data will also be processed by the social media platform itself according to their own practices and privacy notice and we have no influence on this. For a detailed explanation of the respective processing and the possibilities of exercising data subject rights and opting out of tracking with providers of social media networks, we refer to the respective privacy notices of the providers.

Our social media pages and channels and links to their privacy policies:

Our social media pages and channels	Privacy Notice
Instagram	Link
Facebook	Link
LinkedIn	Link
Twitter	Link
Telegram	Link
YouTube	Link
Reddit	Link
TikTok	Link
Discord	Link

Facebook Insights: Bitpanda maintains a Facebook Fanpage ("Fanpage") and uses the associated analytic tool "Facebook Insights". With this tool, Bitpanda receives anonymous statistical evaluations about its Fanpage (e.g. number of visitors, frequency, target groups, etc.). For the processing of personal data in this context Bitpanda and Facebook Ireland Limited ("Facebook") are joint controllers (Art 4 para 7 GDPR) and therefor jointly responsible for the data processing. A corresponding agreement is in place between Bitpanda and Facebook in accordance with 26 para 1 GDPR, which can be accessed via this link. However, Bitpanda does not store any of this data, the data is solely stored by Facebook and processed via Insights. For all questions and inquiries regarding Facebook Insight, Facebook acts as single point of contact and can be contacted via this link.

12. Newsletter:

What is the legal basis for electronic notifications and how to unsubscribe?

If you would like to receive more information in regards to our existing product, related news or new launches, you might want to read our newsletter. We will only send newsletters and other electronic notifications to you if you are subscribed. This will only be the case:

- with your express consent after having subscribed for it (double opt-in); where we will validate that the email address you disclosed is actually yours by asking you to confirm your subscription; or
- after voluntarily subscribing during registration for a Bitpanda account; or
- subscribing while signed into your account via the Mobile App or the website; or
- in compliance with a different legal basis (e.g. Art. 107 para 3 of the Austrian Telecommunications Act [TKG]).

Our newsletter might contain trackers for us to better understand our Clients' interactions with the newsletter. You can find more information on tracking in our Cookie Policy.

If you need a break from our newsletter or do not want to receive it anymore, you may unsubscribe at any time. This, you can either do via your Bitpanda account or via an unsubscribe link at the end of a newsletter email.

13. Retention and deletion periods:

For how long is my personal data processed (stored) and when will it be deleted?

We retain and process your personal data only as long as absolutely necessary. This means for the duration of the entire business relationship (from initiation through performance to termination of a contract), and after that for how long applicable legal retention periods stipulate. Beyond this we retain your data only for a longer period, in accordance with statutory retention and documentation obligations or to defend legal claims. When we perform payment initiation services for you, we will not store the sensitive payment data obtained thereby.

Statutory retention periods applicable to Bitpanda are, inter alia:

- the Austrian Enterprise Code (UGB) and the Federal Tax Code (BAO) that foresee a retention period of seven years,
- the Financial Market Money Laundering Act (FM-GwG) that foresees a retention period of ten years,
- in certain cases, the limitation period according to the Austrian General Civil Code (ABGB) that foresees a retention between three and thirty years ;e.g. if data is required as evidence for legal disputes or for as long as there are other legitimate interests in retention.

- Financial Action Task Force (FATF) Travel Rule that foresees a retention period of as long as necessary in order to fulfil the obligation of preventing money laundering and terrorist financing, but no longer than 10 years according to 21 FM-GwG.

Therefore, your personal data will only be kept as long as absolutely necessary per the conditions above, after which it will be erased from our systems.

Unless expressly stated in this Privacy notice, personal data processed by us shall be erased as soon as they are no longer required for their intended purpose and the erasure does not conflict with any statutory retention obligations.

14. Data subject rights:

What rights do I have under the GDPR/UK GDPR/PDPL?

Right of access (Art 15 GDPR)	You have the right to request confirmation from us as to whether we are processing personal data concerning you and to receive a copy of the personal data concerning you which is undergoing processing. This right can also be exercised directly from either the web or mobile application from our Privacy and Terms section.
Right to rectification (Art 16 GDPR)	You can at any time request to rectify incorrect data and provide supplementary information to an incomplete record.
Right to erasure (Art 17 GDPR)	You can at any time ask us to delete the personal data we have stored about you, which we will act upon unless there is an overriding exception. We will not be able to comply with your request if we still need to process the data in relation to the purposes for which we collected them in the first place (e.g. you are still in an active business relationship with us). Another case where we might deny your request is if you withdraw your consent on which the processing was based but there is another legal basis or overriding legitimate interest on our side for that. The most important case where we cannot delete your data is when we are required to retain it for compliance with a legal obligation under European Union

	or Member state law that we are subject to. In any other case, we will gladly follow-up on your request.
Right to restriction of processing (Art 18 GDPR)	You have the right to ask us to restrict the processing of your personal data where one of the following conditions applies: • you contest the accuracy of the personal data (the restriction shall be put in place for a period which enables Bitpanda to verify the accuracy of the personal data); • the processing of your personal data was unlawful, and you oppose the erasure of your personal data and request instead the restriction of their use; • Bitpanda no longer requires your personal data for the purposes of the processing, but you require them for the assertion, exercise or defence of legal claims; or • you have objected to processing of your personal data and it has not yet been determined whether the legitimate grounds of Bitpanda override your own.
Right to data portability (Art 20 GDPR)	You have the right to receive the personal data concerning you which you have provided to us in a structured, commonly used and machine-readable format. You shall also have the right to request that we transfer these data directly to another controller, designated by you, where this is technically feasible and does not adversely affect the rights and freedoms of others. The right to data portability may only be exercised where the basis of the processing is either your consent or a (pre)contractual necessity, and where the processing is carried out by automated means. The right to data portability does not apply to processing which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Right to object (Art 21 GDPR)	You have the right to object on grounds relating to your particular situation to the processing of your personal data at any time if the processing is based on our legitimate interests. We will stop processing your data for this purpose unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or unless the processing is for the assertion, exercise or defence of legal claims. In regards to personal data processed for direct marketing purposes, you can object at any time by contacting us via the listed contact points. Your objection does not affect the lawfulness of processing your personal data based on legitimate interests before your withdrawal
Right to withdraw consent (Art 7(3) GDPR)	You have the right to at any time withdraw your consent for processing, upon which we will stop processing your personal data based on this legal basis unless a different legal basis is applicable. The withdrawal does not affect the lawfulness of processing your personal data based on legitimate interests before your withdrawal.
Right to not be subject to automated decision-making (Art 22 GDPR)	Except in relation to our Margin Trading for Real Stocks (MT4RS) product (see Section 15), Bitpanda does not use personal data for automated decision-making, including profiling, within the meaning of Art 22 GDPR. Where such automated decision-making takes place, you have the right to obtain human intervention on our part, to express your point of view and to contest the decision (see Section 15).

To exercise one of the above-mentioned rights you can approach us either via our Support or simply contact us via our Helpdesk, or a letter to Bitpanda GmbH, Stella-Klein-Löw Weg 17, 1020 Vienna, Austria. Please note that for such requests we require further identification data from you (e.g. copy of Passport, ID card, etc), in order to ensure that your personal data is only shared with you.

15. Automated decision-making:

Does Bitpanda use my personal data for automated decision-making including profiling?

Except as described below in relation to our Margin Trading for Real Stocks ("MT4RS") product, Bitpanda does not use personal data for automated decision-making, including profiling, within the meaning of Art 22 GDPR.

Automated decision-making in connection with MT4RS: If you apply for or use MT4RS, certain decisions are taken solely by automated means (without human involvement) which produce legal effects concerning you or similarly significantly affect you within the meaning of Art 22(1) GDPR. These include:

Margin eligibility and product access: access to MT4RS is determined by automated product gates, comprising automated eligibility checks, the outcome of the MT4RS appropriateness questionnaire, acceptance of the applicable terms and conditions and risk-warning acknowledgements, and an automated spending-power/risk-engine check.Order execution: before a leveraged order is executed, an automated risk engine performs a spending-power check. Where your projected spending power is positive, the order proceeds; where it is zero or negative, the order is blocked.Ongoing risk controls: once a margin position is open, automated processes continuously monitor your margin level, issue margin calls, may automatically liquidate (close or reduce) your position if defined thresholds are reached, and initiate negative-equity/debt-recovery measures where liquidation proceeds are insufficient to cover the amounts owed.

Logic involved: these decisions are rules-based. They apply predefined eligibility criteria, your responses to the appropriateness questionnaire, the composition and value of your eligible collateral (including collateral weights/haircuts and portfolio value used as collateral), your projected spending power, and defined risk and margin parameters (such as leverage, margin level and liquidation thresholds) to determine whether you may access MT4RS, whether an order may be executed, and whether a position is subject to a margin call or liquidation. Bitpanda does not use external credit reference agencies (e.g. Schufa) or external credit-scoring models for the initial margin decision.

Significance and envisaged consequences: these decisions may result in you being refused access to MT4RS, in an individual order being blocked, in restrictions being applied to your trading, withdrawals, sends or card transactions, and in the automated liquidation of your positions and the creation of a debt (which may include principal, accrued funding fees, late fees and negative-equity amounts) that may be subject to recovery.

Legal basis and safeguards: this automated decision-making is necessary for entering into, or the performance of, your contract with us for the MT4RS product (Art 22(2)(a) GDPR). We implement suitable measures to safeguard your rights, freedoms and legitimate interests, including your right to obtain human intervention on our part, to express your point of view and to contest the decision, which you can exercise via our Helpdesk.

16. Supervisory authority

With which supervisory authority can I file a complaint?

You have the right to file a complaint to the competent supervisory authority, if you think your rights have been violated under the GDPR. In Austria, this is the Data Protection Authority (Datenschutzbehörde).

17. Declaration of consent:

How do I give my consent and how can I withdraw my consent?

You have the right to withdraw your consent at any time via our Helpdesk at this Link. Your consent for marketing communications can be changed anytime within the "Settings" section of the Bitpanda App. Please keep in mind that we might not be able to provide all our services to you anymore, if you withdraw your consent. The withdrawal of your consent does not affect the lawfulness of processing your personal data based on consent before your withdrawal.

18. Bitpanda Enterprise (only applicable for customers of Bitpanda Enterprise)

Bitpanda offers its own Bitpanda Enterprise (BE). This allows the offer of Bitpanda products to customers of certain partners. For this, the infrastructure of Bitpanda is used. Furthermore, to provide the service it is necessary that personal data is transferred between Bitpanda and their partners. Point 18 is only applicable to the data processing of customers of BE partners.

What categories of personal data will be processed and exchanged?

Bitpanda will receive any personal data which is necessary to open a verified account and process them in its role as Controller. Among this data will be name, address, verification data and KYC data (please refer to point 6 and 7). Furthermore, Bitpanda is required to share personal data with the concerned BE partner, when it is necessary for providing the service (please refer to point 7§§).

What's the purpose of it and what's the legal basis?

For the fulfilment of the service, it is necessary to process personal data for the performance of the contract. Furthermore, the processing of, for example, KYC data is necessary due to a legal obligation (please refer to point 7).

What data do we not get?

We won't receive any data which is not necessary for providing the services of Bitpanda. In other words, all data, which is solely necessary for the main service of the partner, won't be transferred to Bitpanda.

Current Bitpanda Technology Solution Customers

Partner	Address	Privacy Notice
Sumeria Solutions SAS	14 Avenue de l'Opéra, 75001 Paris	Link
Plum Fintech CY Limited	Panteli Katelari 21, 1097, Nikosija, Cyprus	Link
Plum Money CY Limited	47 28th October Avenue, Office 202, 2414, Nikosija, Cyprus	Link
N26 Bank GmbH	Klosterstraße 62, 10179 Berlin, Germany	Link
Hype S.p.A.	Piazza Gaudenzio Sella, 1 - 13900 - Biella	Link
iCARD AD	Bulgaria, Business Park Varna B1	Link

RLB Raiffeisenlandesbank Niederösterreich-Wien AG	F.-W.-Raiffeisen-Platz 1, 1020 Vienna Austria	Link
RAKBANK (The National Bank of Ras Al Khaimah (P.S.C.))	RAKBANK HQ Ras Al Khaimah, Sheikh Mohammed Bin Zayed Rd, Ras Al Khaimah, UAE	Link

19. Data Security:

How is my personal data protected?

The security of data is very important to Bitpanda and we are committed to protecting data we collect. We maintain comprehensive administrative, technical and physical measures designed to protect your personal data against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use. These measures meet the highest international safety standards and are regularly reviewed regarding their effectiveness and suitability for achieving the intended safety objectives.

We have implemented the following technical and organisational measures for example:

- SSL encryption on our websites from which we transfer personal data;
- two-factor authentication (2FA) for our platform;
- ensuring the confidentiality, integrity, availability and resilience of our systems and services;
- use of encrypted systems;
- pseudonymisation and anonymisation of personal data;
- entry, access and transfer control for our offices and systems;
- measures for rapid recoverability of the availability of personal data in the event of a physical or technical incident;
- measures for privacy by design and default on our platform like e.g. prevention of User enumeration;

- implementation of procedures for regular review, assessment and evaluation of the effectiveness of the technical and organisational measure to ensure the security of the processing like e.g. our bug bounty programme;
- internal IT security guidelines and IT security trainings;
- incident-response management.
- Obtained ISO/IEC 27001 security certification

Please also make sure that you use the two-factor authentication (2FA) for your Bitpanda account, keep your access data confidential and protect your computer against unauthorised access.

20. Updates of this Privacy Notice:

How will I find out about changes to this Privacy Notice?

We, Bitpanda, are committed to upholding the principles of data protection up to date. For this reason, we regularly review and update our Privacy Notice. This is to ensure that it is correctly and clearly displayed on our website, contains appropriate information about your rights and our processing activities (also with regard to technical changes or business development) and is implemented in accordance with applicable law, thus complying with data protection requirements. We update this Privacy Notice from time to time when required, in order to take current circumstances into account. If we make significant changes to this Privacy Notice, we will notify you after the login into your account and provide you with the updated version of the Privacy Notice. If it is required by applicable law, Bitpanda will obtain your express consent to significant changes.

21. How to contact us?

Thank you for reading our Privacy Notice!

If you have any further questions about this Privacy Notice or the processing of your personal data, please contact our Data Protection Officer by submitting the following form: Contact the DPO.