

Policy regarding the Processing of Personal Data

(together with the Cookie Policy)

This Card Services Privacy and Cookie Policy explains how BITBROKER - FZCO collects, uses, shares, stores, and protects personal data in connection with Card Services made available through <https://chain-bridge.org>.

The Website is a shared digital environment. This Policy applies only to personal data processed by BITBROKER for the Card Services. Other legal entities using the Website process personal data under their own privacy documents.

1. Controller information

The controller is BITBROKER - FZCO, a company incorporated in Dubai, United Arab Emirates, registration number 62244, commercial licence number 64729, with operating address at Premises No. 64729-001, IFZA Business Park, Dubai Digital Park, Dubai Silicon Oasis, Dubai, United Arab Emirates. Privacy enquiries may be sent to business@chain-bridge.org.

2. Applicable data protection framework

BITBROKER processes personal data in accordance with Federal Decree-Law No. 45 of 2021 Regarding the Protection of Personal Data, its implementing requirements, and other applicable laws of the United Arab Emirates. Where another mandatory data protection law applies to a User, BITBROKER will apply that law to the extent required.

3. Personal data we collect

3.1 Identification and verification data

- full name, date and place of birth, nationality, citizenship, gender, and residential address
- identity document details, copies, issuing authority, issue date, and expiry date
- photograph, video, liveness information, facial verification results, and other verification data
- tax identification information and source of funds or source of wealth information where required
- sanctions, politically exposed person, adverse media, fraud, and other compliance screening results

3.2 Contact and account data

- email address, telephone number, login identifiers, authentication records, and support communications

- account status, consents, acceptance records, security settings, and service preferences

3.3 Card and transaction data

- Card application, programme, status, masked Card details, limits, and service settings
- transaction amount, currency, merchant information, date, status, identifiers, refunds, reversals, disputes, and fees
- funding and settlement information, wallet or payment identifiers, exchange rate information, and reconciliation records
- information provided during investigations, complaints, refunds, and chargeback procedures

3.4 Technical and usage data

- IP address, device identifiers, browser type, operating system, language, approximate location, and access time
- session, authentication, security, diagnostic, and activity logs
- cookie identifiers and information about use of the Card Services Section

4. How we collect personal data

BITBROKER collects personal data:

- directly from the User through registration, application, verification, transactions, and support requests
- automatically when the User accesses or uses the Card Services Section
- from Card Service Providers, issuers, identity verification providers, payment and settlement providers, merchants, and other service providers
- from public databases, sanctions lists, fraud prevention sources, and competent authorities where lawful
- from another legal entity operating through the Website where the User has requested the Card Services and the transfer is lawful

5. Purposes of processing

BITBROKER processes personal data to:

- register the User and manage access to the Card Services
- verify identity and eligibility and perform KYC, sanctions, fraud, and risk checks
- submit Card applications and administer Card-related requests
- arrange funding, transaction processing, settlement, fees, conversion, refunds, reversals, and disputes
- authenticate the User and protect accounts, Card details, systems, and transactions
- provide support, investigate complaints, and communicate service notices

- monitor performance, prevent misuse, improve functionality, and maintain service continuity
- comply with law, regulatory obligations, provider requirements, court orders, and lawful authority requests
- establish, exercise, or defend legal claims and maintain business and audit records

6. Legal bases

Depending on the processing activity, BITBROKER relies on one or more of the following bases:

- the User's consent
- steps requested by the User before entering into a contract and performance of the Card Services User Agreement
- compliance with legal and regulatory obligations
- BITBROKER's legitimate interests in operating, securing, improving, and protecting the Card Services, provided those interests do not override the User's rights
- the establishment, exercise, or defence of legal claims
- another lawful basis recognised by applicable law

Where consent is required, the User may withdraw it by contacting BITBROKER. Withdrawal does not affect processing already carried out lawfully and does not prevent processing that remains necessary under another lawful basis.

7. Recipients of personal data

BITBROKER may disclose personal data where necessary to:

- Card Service Providers, issuing banks, payment networks, payment processors, settlement providers, and merchants involved in a transaction
- identity verification, screening, fraud prevention, blockchain analytics, authentication, and security providers
- cloud hosting, communications, customer support, analytics, document storage, and other technology providers
- professional advisers, auditors, insurers, banks, and contractual counterparties
- competent courts, regulators, law enforcement agencies, government authorities, and other persons where disclosure is legally required
- a buyer, investor, successor, or restructuring participant in connection with a proposed or completed corporate transaction, subject to appropriate safeguards

Recipients may act as independent controllers or processors, depending on their role. BITBROKER requires processors to use personal data only for agreed purposes and to apply appropriate safeguards.

8. Cross-border transfers

The Card Services are international. Personal data may be transferred to and processed in countries outside the United Arab Emirates, including countries in which Card Service Providers, issuers, identity verification providers, technology providers, payment networks, or support teams operate.

BITBROKER uses safeguards required by applicable law. These may include contractual protections, risk assessments, access restrictions, encryption, recipient due diligence, and other measures appropriate to the transfer and the nature of the data.

9. Retention

BITBROKER retains personal data only for as long as necessary for the purposes described in this Policy, including the duration of the relationship and any period required for transaction records, compliance, audit, dispute resolution, fraud prevention, or legal claims. Retention periods may vary by data type, provider requirement, and applicable law. Data is deleted, anonymised, or securely restricted when continued retention is no longer required.

10. Security

BITBROKER applies technical and organisational measures designed to protect personal data against unauthorised access, disclosure, alteration, loss, or destruction. Measures may include access controls, encryption, logging, monitoring, staff confidentiality obligations, incident response, vendor controls, and periodic review. No system can guarantee absolute security.

11. User rights

Subject to applicable law and available exceptions, the User may request:

- confirmation of whether personal data is processed and access to relevant information
- correction or completion of inaccurate or incomplete personal data
- deletion of personal data where there is no lawful reason to retain it
- restriction of processing in circumstances recognised by law
- transfer of personal data in a structured and machine-readable format where applicable
- objection to certain processing based on legitimate interests
- withdrawal of consent where processing is based on consent
- review of a decision based solely on automated processing where applicable

Requests may be submitted to business@chain-bridge.org. BITBROKER may request information needed to verify identity and may refuse or limit a request where permitted by law. The User may also contact the competent UAE data protection authority where the User believes that their rights have been infringed.

12. Cookies

The Card Services Section may use cookies and similar technologies to operate sessions, remember preferences, secure authentication, prevent fraud, measure performance, and understand service use.

12.1 Strictly necessary cookies

These support login, security, session continuity, consent records, and essential functionality.

12.2 Functional cookies

These remember language, interface, and service preferences.

12.3 Analytics cookies

These help measure use and improve performance. Where required by applicable law, analytics cookies are used only after the User provides consent.

The User may manage non-essential cookies through the available consent tool or browser settings. Disabling essential cookies may prevent parts of the Card Services from functioning.

13. Automated checks

BITBROKER and its providers may use automated tools to assess identity, eligibility, sanctions, fraud, security, and transaction risk. A Card application or transaction may be delayed, restricted, or declined as a result. Where required by law, the User may request human review of a decision that produces a significant legal or similar effect.

14. Children

The Card Services are not intended for individuals under 18 years of age. BITBROKER does not knowingly provide Card Services to minors.

15. Changes to this Policy

BITBROKER may update this Policy to reflect changes in law, provider arrangements, technology, or processing activities. The current version is published on the Website. Material changes will be communicated where reasonably practicable or legally required.

16. Contact

Privacy enquiries and rights requests may be sent to business@chain-bridge.org. Correspondence may also be sent to BITBROKER - FZCO, Premises No. 64729-001, IFZA Business Park, Dubai Digital Park, Dubai Silicon Oasis, Dubai, United Arab Emirates.