

PRIVACY POLICY

BitBook.trade (BitBook) | BitBook Trade Limited (Hong Kong)

Version: 2.0 (Merchant-ready) | Effective date: 2026-02-25

IMPORTANT: This document is designed for merchant on-boarding / payment provider reviews. Replace bracketed placeholders (e.g., *[Company registration number]*) with your verified corporate details.

1. Introduction

This Privacy Policy explains how BitBook Trade Limited, a company incorporated in Hong Kong (the “Company”, “we”, “us”, “our”) collects, uses, stores, discloses, and otherwise processes personal data in connection with the website and services available at <https://bitbook.trade> (the “Website”) and related products such as paid subscriptions and API access (the “Services”).

This Policy is intended to meet typical requirements of banks and payment providers during merchant account onboarding, including clear disclosures about payment processing, refunds/chargebacks coordination, data retention, security controls, and cross-border processing.

2. Controller and Contact Details

Data Controller: BitBook Trade Limited (Hong Kong).

Registered office: [Insert Hong Kong registered address].

Company registry number: [Insert CR No.].

Primary contact (privacy): [Insert privacy@bitbook.trade or other official email].

Customer support contact: [Insert support email].

Note: The public Website currently provides a Telegram-based feedback contact; payment providers often require an email and physical address to be displayed on legal pages.

3. Scope and Nature of the Services

BitBook.trade is positioned as an informational and analytical platform. The Services may include: dashboards, rankings, statistics, community features, research content, alerts, and API endpoints that return analytical or market information.

No custody / no execution: The Company does not (i) hold customer fiat or crypto funds, (ii) execute trades, (iii) provide brokerage services, (iv) provide personal investment advice, or (v) act as a payment institution.

Where the Website references broader ecosystem products (e.g., cards, wallets, or trading-related tooling), those may be provided by third parties under separate terms; in such cases, this Policy governs only the Company’s processing in connection with BitBook.trade unless expressly stated otherwise.

4. Definitions

“Personal Data” means any information relating to an identified or identifiable natural person.

“Processing” means any operation performed on Personal Data (collection, storage, use, disclosure, deletion, etc.).

“Subscription” means a paid plan providing additional features or content.

“API” means an application programming interface through which authorized users may programmatically access certain data outputs.

“**Payment Provider**” means a third-party processor or merchant-of-record service that processes Subscription payments.

5. Categories of Data We Collect

5.1 Account and Profile Data (if applicable): name, email address, login credentials (hashed), account identifiers, preferences.

5.2 Subscription and Billing Data: plan selected, billing cycle, invoices/receipts, payment status, partial payment identifiers from Payment Providers (e.g., tokenized card reference, transaction ID). We do **not** store full card numbers or CVV.

5.3 Communications: support requests, messages, feedback, and attachments you submit.

5.4 Technical and Usage Data: IP address, device identifiers, browser details, pages viewed, timestamps, referral URLs, cookies, crash logs, and security logs.

5.5 Analytics and Aggregations: aggregated/anonymous metrics derived from usage patterns.

6. How We Collect Data

Directly from you when you create an account, subscribe, request support, or otherwise interact with the Website.

Automatically through cookies, logs, pixels, SDKs, and similar technologies when you browse or use the Services.

From Payment Providers (and only as necessary) such as payment confirmation, status, chargeback notifications, and limited identifiers.

7. Purposes of Processing

We process Personal Data for the following purposes:

- to provide and operate the Services, including account management and feature delivery;
- to process and administer Subscriptions (billing, invoices, renewals, cancellations);
- to provide customer support and communicate service-related notices;
- to maintain security, detect abuse, and prevent fraud;
- to improve and develop the Website and analytics outputs;
- to comply with legal obligations, enforce our Terms of Service, and manage disputes.

8. Legal Bases (GDPR-compatible statement)

Where EU/UK data protection concepts apply, we rely on: (i) performance of a contract (providing Services), (ii) legitimate interests (security, improving Services, fraud prevention), (iii) consent (certain cookies/marketing where required), and (iv) compliance with legal obligations.

Even where GDPR is not formally applicable, we follow comparable principles (purpose limitation, data minimization, storage limitation, security).

9. Cookies and Similar Technologies

We use cookies and similar technologies for: (a) essential functionality (authentication, security), (b) preferences, and (c) analytics.

You may manage cookie settings via your browser and, where available, via our cookie banner/settings tool.

Disabling certain cookies may reduce functionality.

10. Payment Processing (Merchant Disclosure)

Subscription payments are processed by Payment Providers. Depending on the setup, the Payment Provider may act as a processor or merchant of record.

We receive confirmation and limited metadata about successful/failed payments, refunds, and chargebacks to provide Services and support.

We do not store full payment card details. Card data is handled by Payment Providers using PCI-DSS compliant systems.

11. Refunds and Chargebacks (Data Aspects)

If you request a refund or initiate a chargeback, we may process your Personal Data (including transaction identifiers and communications) to investigate the request, provide evidence to the Payment Provider, and comply with payment network rules.

We may retain dispute records for statutory limitation periods and for chargeback defense.

12. Sharing and Disclosure

We may share Personal Data with the following categories of recipients:

- infrastructure and hosting vendors (cloud hosting, CDN, monitoring);
- analytics vendors (traffic measurement);
- email delivery and customer support tools;
- Payment Providers (billing, disputes, refunds);
- professional advisers (legal, accounting) under confidentiality;
- authorities where required by law or to protect our rights.

We do not sell Personal Data.

13. Cross-Border Transfers

Your data may be processed in Hong Kong and in other jurisdictions where our vendors operate. We implement contractual and technical safeguards appropriate to the sensitivity of the data and the risks of processing.

14. Data Retention

We keep Personal Data only as long as necessary for the purposes described in this Policy. Typical retention periods:

- account and subscription records: while the account is active and for a reasonable period thereafter;
- invoices and payment records: as required by tax/accounting laws;
- security logs: retained for a limited period necessary for security investigations;
- dispute/chargeback records: retained through the dispute process and applicable limitation periods.

We may anonymize data for long-term analytics.

15. Security Measures

We implement commercially reasonable technical and organizational measures including: encryption in transit (TLS), access controls, least-privilege administration, monitoring and alerting, vulnerability management, and incident response procedures.

No method of transmission over the Internet is 100% secure; however, we take appropriate steps to reduce risk.

16. Sanctions and Restricted Jurisdictions (Compliance Statement)

Although the Services are informational, we may restrict access or terminate accounts where required to comply with sanctions or where we reasonably suspect unlawful use (e.g., fraud, sanctions evasion, abuse of payment systems).

17. Children's Privacy

The Services are not intended for individuals under 18 years of age. We do not knowingly collect Personal Data from children.

18. Your Rights and Choices

Depending on your jurisdiction, you may have rights to access, correct, delete, or restrict processing of your Personal Data, and to object to certain processing. You may also withdraw consent where processing is based on consent.

Requests should be submitted via the official contact details in Section 2. We may request verification to protect your privacy.

19. Changes to This Policy

We may update this Policy from time to time. The updated version will be published on the Website with a revised effective date. Material changes may be notified via account notice or email where appropriate.

20. Governing Law

This Privacy Policy is governed by the laws of Hong Kong, without regard to conflict of law principles.

Appendix A — Merchant Onboarding Notes (Informational)

Banks and Payment Providers may require that the Website displays: (i) legal entity name, (ii) registered address, (iii) support email, (iv) refund policy, (v) product/service description, (vi) pricing and billing terms, and (vii) dispute/chargeback handling information.

This Appendix is informational and does not create contractual rights beyond the Policy.