

Privacy Statement Paucitas B.V.

Version 2026/09 | Valid from 1 September 2026 | Replaces all earlier versions | In the event of translations, the Dutch text prevails

Our view on privacy

Paucitas B.V. (we-form), established in the Netherlands, provides services to our website visitors, (former) clients and other (natural) persons who have contacted us (you-form). We are an independent research and consultancy firm in the field of blockchain and cryptocurrencies. Our services include, among other things, analysing transactions and (suspected) fraud situations, wallet and source-of-funds research, mapping crypto assets, counter-expertise, preparing reports, guidance in securing or cashing out accessible balances, and providing explanation, training courses and lectures, as described on our website and in our general terms and conditions. In the context of these services ('Services') we process personal data.

We consider the protection of the personal data we process to be of the utmost importance. When processing personal data, we are bound by the General Data Protection Regulation (GDPR). In this privacy statement, we explain how we protect your privacy and how we handle your personal data.

Do you have questions about this privacy statement? At the bottom, you can read how to contact us about it.

Who processes your personal data?

This privacy statement concerns the processing of personal data by Paucitas B.V. as data controller. Our company is established at Weesperstraat 107, 1018 VN Amsterdam, the Netherlands (Chamber of Commerce/KvK 83489649). You can reach us by telephone during office hours on +31 20 244 5774 or by e-mail via paucitas@paucitas.com.

Which personal data do we process?

Personal data is data that says something about you or that can be linked to you. Everything that can be done with personal data, such as collecting, storing, using, transferring or deleting, is called 'processing'. First and foremost, we process personal data that you provide to us yourself, for example by sending us an e-mail or supplying documents.

When you use our Services, we may collect the following data:

- Personal identification data, such as your name, date of birth and nationality;
- Contact details, such as your address, postal code, place of residence, telephone number and e-mail address;
- Payment details, such as a VAT number or bank account number;

- Data required for the research you engage us for, such as wallet addresses, transaction data, correspondence with platforms or counterparties, and the documents and screenshots you supply;
- Other information that you voluntarily share with us, such as social media accounts, IP addresses, browser settings, feedback and opinions;
- Other information that is necessary for our services.

In addition, we may obtain personal data from other sources, such as the Trade Register of the Dutch Chamber of Commerce, the Dutch Land Registry (Kadaster), public (business) websites and public blockchain data. We may also receive personal data from our clients. When carrying out research, we may process data about persons other than our client, such as (suspected) counterparties, but only insofar as this is strictly necessary for the research and the report and insofar as the law permits. We do not conduct criminal investigations and do not establish guilt; our reports describe factually established transaction flows and findings.

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

We process personal data for the following purposes, on the basis of the legal basis stated:

- Quotation and contact prior to the Agreement: name and address details and/or company name, e-mail address, telephone number and other data needed to prepare the quotation. Legal basis: necessary to take steps at your request prior to entering into an agreement;
- Performance of our Services, including research and reporting: name and address details, e-mail address, financial data, research data (such as wallet addresses and transaction data) and other data necessary for the services. Legal basis: necessary for the performance of the agreement and, insofar as it concerns data of persons other than our client, our legitimate interest in sound research and sound reporting, within the limits set by law;
- Our financial administration and invoicing: company name and/or name and address details, invoice address, payment and bank details, outstanding balance. Legal basis: legal obligation;
- Complaint handling and other communication with you: name and address details, e-mail address, your feedback or opinion. Legal basis: necessary for the performance of the agreement;
- Relationship management (CRM): company name and/or name and address details, e-mail address and telephone number. Legal basis: legitimate interest;
- Direct marketing to existing relations: name, e-mail address and telephone number. Legal basis: legitimate interest; you can always unsubscribe via the unsubscribe option in the message or by e-mailing us;
- Job applications: name and address details, e-mail address, telephone number, CV, employment history and other information you voluntarily share. Legal basis: legitimate interest or consent;
- Analysis of statistics and optimisation of our website and Services: IP address, browser data, date and time. Legal basis: legitimate interest.

We do not use personal data for purposes other than those described above, unless you have given your prior consent.

How do we handle your personal data?

We ensure that your personal data is secured against loss, unlawful processing and misuse. Among other things, we have taken the following technical and organisational measures:

- Logical access control, for example through the use of passwords and two-step verification;
- Minimisation and updating of personal data;
- Applying the shortest possible retention periods;
- Encrypting and pseudonymising data where necessary;
- Purpose-bound access restrictions and verification of authorisations;
- Arrangements (data processing agreements) with parties that process data on our behalf, such as our hosting and software suppliers.

How long do we retain your personal data?

We do not retain your data longer than necessary for the purpose for which it was processed, and we comply with the statutory retention periods. In general:

- We retain data of website visitors for a maximum of 12 (twelve) months;
- We retain files and reports for up to 5 (five) years after completion of the assignment, in line with the period within which we can be held liable;
- We retain data for our financial administration for at least 7 (seven) years (statutory tax retention obligation);
- We retain job application data until 4 (four) weeks after the end of the application procedure, unless you give us your consent in Writing to retain it longer.

Do we share your personal data with third parties?

In principle, we do not share your personal data with third parties without your consent. Sometimes, however, it may be necessary, for example to share your personal data with judicial authorities or with a counterparty, or to conclude an agreement or notarial deed. Data may also be shared with contractors engaged by us, such as a bailiff or a hosting party. Furthermore, there may be legal obligations on the basis of which we must provide personal data to third parties, for example on the basis of a court decision. Your personal data will never be shared with third parties for commercial purposes.

Websites and services of third parties

Our working method is designed so that we need to share as little information as possible with third parties. Information is only shared if this is necessary for our services and only with parties with an appropriate level of protection and security.

Via our website, you can click through to websites of third parties. This privacy statement only covers personal data that we process ourselves. It therefore does not apply to websites or applications of third parties, such as Google or WordPress. Therefore, always read the privacy statement of these third parties. You can find Google's privacy policy via <https://policies.google.com/privacy>, and that of WordPress via <https://automattic.com/privacy/>.

Transfer of personal data outside the EEA

For the purposes in this privacy statement, we may transfer personal data to countries outside the European Economic Area, for example because a software supplier is established there. We only do so if the country in question offers an appropriate level of protection or if appropriate safeguards have been put in place, such as standard contractual clauses approved by the European Commission, and we thereby comply with the GDPR.

Automated decision-making

Paucitas B.V. does not make decisions based on automated processing on matters that may have (significant) consequences for persons, i.e. without human involvement.

Cookies, or comparable techniques, that we use

Paucitas B.V. uses functional, analytical and tracking cookies. A cookie is a small text file that is stored in the browser of your computer, tablet or smartphone on your first visit to our website. Functional cookies ensure that the website works properly and that, for example, your preference settings are remembered. Analytical cookies help us optimise the website. In addition, only with your consent via the cookie banner, we place cookies that track your browsing behaviour so that we can offer tailor-made content and advertisements. Cookies are also placed on our website by third parties, such as Google Analytics, Google Ads and Facebook. If you do not give consent, we do not place these tracking and advertising cookies.

You can opt out of cookies by setting your internet browser so that it no longer stores cookies, and you can delete previously stored information via your browser settings. For an explanation, see: www.veiliginternetten.nl/thema/je-bedrijf/wat-zijn-cookies/.

Your rights: viewing, amending or deleting personal data

Under the GDPR, you have the following rights:

- Right of access to the personal data we process about you;
- Right to rectification or completion of incorrect or incomplete data;
- Right to erasure of data that is not (or no longer) necessary;
- Right to restriction of processing;
- Right to object to processing, including to direct marketing;

- Right to data portability;
- Right to withdraw consent given, for example for receiving a newsletter.

Do you wish to exercise one of these rights? Then e-mail paucitas@paucitas.com or send your request to Paucitas B.V., attn. Personal data access request, Weesperstraat 107, 1018 VN Amsterdam, the Netherlands. To make sure that the request was made by you, we may ask you for additional information to verify your identity. Never send a full copy of your identity document unsolicited. If, by way of high exception, we do ask for it, then cover your photo, the MRZ (the strip of numbers at the bottom of the passport), the document number and your citizen service number (BSN). We will respond as soon as possible, but in any event within 1 (one) month of receiving your request.

Complaints and the supervisory authority

The Dutch Data Protection Authority (Autoriteit Persoonsgegevens) supervises compliance with the GDPR. Do you believe that we are not complying with the applicable privacy legislation? Then contact us; we will be happy to help you find a solution. In addition, you always have the right to lodge a complaint with the Dutch Data Protection Authority.

About this privacy statement

Privacy regulations change regularly. We do our best to keep this privacy statement up to date and may amend it from time to time. We will inform you of important changes in a clear manner. You can always find the most recent version on our website. This privacy statement was last amended on 1 September 2026.