

BuyTap Privacy Policy — Legal & Compliance

(Draft)

Domain: buytap.trade

Entity: BuyTap Inc. (U.S. registered, operating in Kenya)

Address: Building 800, S Figueroa Street, L.A. Live, Staples Center, Los Angeles, CA 90017

Last Updated: 2025-08-21

1. Introduction

BuyTap Inc. ("BuyTap," "we," "our," or "us") respects your privacy. This Privacy Policy explains how we collect, use, store, and protect your personal information when you use our peer-to-peer token trading platform at **buytap.trade**.

By creating an account or using our services, you consent to the practices described in this policy.

2. Data We Collect

We may collect the following categories of information: - **Account information:** name, email, phone number, username.

- **Verification data:** government-issued ID, proof of address (where required).

- **Transaction data:** order history, amounts, payment confirmations (screenshots, M-Pesa references).

- **Technical data:** device type, browser, IP address, cookies, log data.

- **Support data:** tickets, messages, and communications with us.

3. How We Use Your Data

We process your data for the following purposes: - To provide and operate the BuyTap platform (order creation, pairing, confirmations).

- To verify identity and comply with **Know Your Customer (KYC)/Anti-Money Laundering (AML)** requirements.

- To prevent fraud, abuse, and unauthorized access.

- To improve platform performance, security, and user experience.

- To comply with legal obligations in the **United States** and **Kenya**.

- To communicate updates, support, and service notices.

4. Legal Bases for Processing

We rely on the following legal bases: - **Contract necessity**: to provide services you sign up for.

- **Legal obligation**: to comply with AML/KYC, tax, and other regulations.
 - **Legitimate interests**: fraud prevention, platform improvement.
 - **Consent**: for marketing communications and optional analytics cookies.
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5. Sharing of Data

We may share your data with: - **Service providers**: hosting, analytics, email, SMS providers.

- **Payment operators**: e.g., M-Pesa, only for processing and verification.
- **Authorities**: when legally required in the U.S. or Kenya.
- **Affiliates**: within BuyTap group companies for operational purposes.

We never sell your personal data.

6. International Data Transfers

As a U.S. company operating in Kenya, your data may be stored and processed in both regions. We use **secure cloud providers** and apply safeguards consistent with Kenyan Data Protection Act (2019) and relevant U.S. privacy standards.

7. Data Retention

- **KYC/AML data**: kept for 5 years after account closure (regulatory requirement).
 - **Order and transaction logs**: kept for 12–24 months.
 - **General account data**: retained until you delete your account, or as required by law.
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8. Your Rights

You have the right to: - Access and request a copy of your data.

- Request correction of inaccurate data.
 - Request deletion (subject to legal retention).
 - Withdraw consent for optional data uses.
 - Object to certain processing.
 - File a complaint with the **Kenya Office of the Data Protection Commissioner (ODPC)** or the relevant U.S. authority (e.g., FTC).
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9. Cookies

We use: - **Essential cookies**: to keep you logged in and secure.
- **Analytics cookies (optional)**: only with your consent.

For details, see our [Cookie Notice].

10. Security

- Encryption of data in transit (HTTPS).
 - Role-based access controls for staff.
 - Fraud monitoring and audit logs.
 - Regular security updates and monitoring.
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11. Children's Data

Our services are **not for individuals under 18**. We do not knowingly collect data from minors.

12. Contact Us

If you have questions about this Privacy Policy or wish to exercise your rights:

Data Protection Officer (DPO)

BuyTap Inc.

Building 800, S Figueroa Street, L.A. Live, Staples Center

Los Angeles, CA 90017

Email: **privacy@buytap.trade**

End of Privacy Policy — Legal & Compliance