

Requests Policy

For requests from Competent Authorities

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1. Introduction

We remain committed to assisting the efforts of any competent authority to the best of our abilities. In this direction, we have established a system as illustrated in this policy, to ensure that all requests are handled securely, without delay or unnecessary complications, and in accordance with applicable laws.

The processing of requests, of competent authorities, is subject to this Policy with specific terms and conditions (hereinafter “Policy” or “Requests Policy”). The Policy outlines the provisions and the predefined procedures after which EasyBit (hereinafter also referred to as “We”, “Us” or “Service”) satisfies any requests in relation to easybit.com (hereinafter “Website” or “Platform”) and any associated services.

2. Definitions

2.1 Competent Authority

As Competent Authority is defined, any party, person, or organization, that is legally empowered by the government, state, municipality, or similar, to exercise or perform the powers, duties, and functions of filing requests for, obtaining information, releasing frozen assets, conducting investigations, or similar duties, including but not limited to security forces; law enforcement bodies; local or international courts; competent governmental, intergovernmental, or supranational bodies; competent agencies, departments, regulatory authorities, self-regulatory authorities or organizations.

2.2 Information Request

An Information Request is defined as a formal document issued by Law Enforcement or other Competent Authority, requesting specific data or information pertinent to an ongoing investigation, legal proceeding, or regulatory compliance check. Such requests are commonly made when there's a need to access or review information necessary for the advancement of legal inquiries, the enforcement of laws, or adherence to regulatory standards. The objective of an Information Request is to obtain relevant data, records, or documents that may include personal details, transaction histories, communication logs, or other related information.

Equivalent and acceptable documents that serve the same function include, but are not limited to: Information Demand Notice, Data Request Order, Investigative Inquiry, Legal Data Request, Regulatory Compliance Query, Law Enforcement Data Demand, Court-Ordered Information Submission, and Regulatory Information Order. These documents are acknowledged as being on par with Information Requests in terms of their purpose and legal validity.

For the purposes of this Policy, all such acceptable documents with an equivalent status to an Information Request will be hereinafter referred to as 'Information Request.'

2.3 Release Request

A Release Request is defined as a formal document issued by Law Enforcement or other Competent Authority, requesting the release and transfer of assets, documents, or other specified items that are under restriction or control. This request is typically made in the context of legal proceedings, investigations, or regulatory compliance matters, where assets have been previously frozen, withheld, or seized. The purpose of a Release Request is to authorize and facilitate the return of these assets or information to their rightful owner or another designated entity.

Other recognized and acceptable documents serving a similar purpose include, but are not limited to: Police Directive, Release Letter, Law Enforcement Order, Release Notice, Authorization Letter, Release Order, Judicial Order, Court Order, and MLAT Request. These documents are recognized as fulfilling comparable roles and carrying similar legal weight.

For the purposes of this Policy, all aforementioned documents that meet or exceed the standards of a Release Request will be hereinafter referred to as a 'Release Request.'

3. Necessary Documentation

In our effort to assist any Competent Authority effectively, EasyBit requires official documentation supporting any request. The supporting documentation should contain what is specified in this Policy and shall be created and sent to us in accordance with this Policy.

While this Policy includes the terms, guidelines, and warranties intended for Information Requests, and Release Requests, the principles can be adopted for all similar requests that may be issued by a Competent Authority.

(hereinafter the Information Request, Release Request, and similar documents are also jointly referred to as “Request” or “Requests”).

4. Guidelines for Requests

The terms, conditions, and warranties contained below in this Policy constitute a prerequisite for the successful processing and satisfaction of the Request. Should a Request not satisfy this Policy - EasyBit reserves the right to ignore it.

4.1 General Guidelines

All Requests directed to us:

- ❖ Shall be clearly labeled with a title that accurately reflects its purpose (e.g. Information Request or similar for a request for Information, or Release Request or similar for a request to release frozen assets);
- ❖ Shall be made on a legal basis;
- ❖ Shall include any file numbers or reference IDs related to the case;
- ❖ Shall be issued by a competent authority, as defined in Paragraph 1. with the authority and legal power to issue the Request;
- ❖ Shall include complete, accurate, and valid information about the competent authority issuing the request;
- ❖ Shall include a postal address, contact phone numbers, official email address, and website, if any, of the competent authority;
- ❖ Shall be shared with us from an official email address associated with the competent authority;
- ❖ Shall be made in, or translated to English;

- ❖ Shall be signed by the issuing officer;
- ❖ Shall Include the official seal or stamp of the Competent Authority;
- ❖ Shall include the full name and title of the person in charge of the inquiry;
- ❖ If any person, different from the one in charge of the inquiry, mediates to forward the Request, then this person shall be a representative authorized in the Request, whose full name and title should be included;
- ❖ Shall include the date when the documentation was issued;
- ❖ Shall include a description of the relevant case or investigation;
- ❖ Shall include in detail, any information relevant to the request, e.g. if the request is regarding a transaction, such information as involved wallet addresses, transaction hashes, and amounts transferred, along with any other important information should be included.

4.2 Information Request Guidelines

All Information Requests directed to us:

- ❖ Shall meet all the General Guidelines;
- ❖ Shall contain a description of the type of information that the competent authority wishes to receive.
- ❖ Shall clearly state any proposed actions or methods during the processing of information;
- ❖ On certain occasions, EasyBit may impose AML Measures as part of our AML Policy, following a report by authorities, including but not limited to, KYC procedures, SOF requests, account restrictions, and data blacklisting, among others that may be conducted per case - if these actions are not accepted by the Competent Authority, the Request shall explicitly advise against it.

4.3 Release Request Guidelines

All Release Requests directed to us:

- ❖ Shall meet all the General Guidelines;
- ❖ Shall include detailed information (e.g. transaction hashes, wallet addresses, amounts, and currencies) of the frozen transactions that need to be released and returned to the rightful owner(s);
- ❖ Shall contain explicit instructions on where the assets should be transferred, including the destination wallet addresses for the return of each frozen transaction;
- ❖ On certain occasions, EasyBit may seek verification from the receiving party and/or rightful owner, confirming that the destination addresses provided in the Request are correct, so if this is not accepted by the Competent Authority, the Request shall explicitly advise against it.

5. Warranties

By forwarding a Request to us, you accept the contents of this Policy and you declare and warrant that:

- ❖ You represent a Competent Authority as defined in Paragraph 2.1;
- ❖ You are legally empowered in your jurisdiction to issue or forward the Request;
- ❖ The outcome resulting from the satisfaction of the Request will be legal and in association with the purposes and duties of a Competent Authority and not personal interests or similar;
- ❖ You are not furthering, performing, undertaking, engaging in, or aiding any unlawful activities through the Request;
- ❖ You are responsible for safeguarding the correspondence and any information shared with you and making organized efforts in the direction of avoiding any data leakage;

- ❖ You are responsible for maintaining such information for as much as provisioned by applicable laws.

Any party falsely claiming to be and/or impersonating a Competent Authority may face criminal liability and/or prosecution.

6. Processing of Requests

The Request shall be directed to our legal department at the following email address: security@easybit.com. EasyBit will take all necessary actions to ensure the security and confidentiality of all information and documents provided by the Competent Authority.

All Requests undergo thorough reviewing and processing. Such procedures usually last 5 to 10 business days, but on certain occasions might take longer in relation to service load and the complexity of the request.

As a first step, EasyBit will review the Request to ascertain its authenticity, to verify that the authority issuing it is indeed empowered to exercise or perform the duty of filing such Requests and to ensure that such Request would be in accordance with applicable laws.

On certain occasions and types of requests or when the above-mentioned are not verified, EasyBit may come back with more requirements, extra measures, or certain procedures that might be considered essential. Instances of extra requirements include but are not limited to, extended identification procedures for the involved parties, and the documents to be enforced and recognized in our jurisdiction, among others.

In the event that the received Request is deemed incomplete or not in line with the Terms as specified in this Policy, EasyBit may revert and request more information and/or documentation from the Competent Authority filing it but also reserves the right to ignore it.

After the reviewing and verification procedures are successfully completed, and the Request is deemed authentic and in line with this Policy, EasyBit will take all necessary actions to satisfy it.

7. Limitation of Liabilities

EasyBit is dedicated to adopting the best practices, taking effective measures, and

utilizing robust protocols, to satisfy any legitimate request. All information is provided on an “as is” and “as available” basis and all actions are taken with the best principles to the extent of our knowledge and capabilities. In no event shall EasyBit, the owners, directors, officers, members, employees, or agents, be held liable or responsible, for the accuracy, adequacy, and completeness of the information disclosed or actions performed to satisfy the Request, and shall bear no liability for potential discrepancies or errors, that may arise as a result of human oversight, systemic deficiencies, or email transmission errors.

8. Confidentiality Notice

Any information distributed to the competent authority through email correspondence or other means shall be deemed confidential and privileged and shall be used only for the purposes of the Request. Any unauthorized use, reproduction, or dissemination of the email correspondence and its attached documents, if any, is strictly prohibited.

For any Request or clarification on this Policy, please reach out to security@easybit.com.