Bitfly
staking gmbh

DATA PROTECTION
DECLARATION

V1 - 02 Nov 2021

Data Protection Declaration of bitfly staking gmbh, Wiedner Gürtel 9, 1100 Vienna, Austria ("**bitfly**"; "**We**") concerning the website ethpool.org and all available subdomains.

Thank you for your interest in the services of bitfly. The protection of your privacy and thus the protection of your (personal) data is Our highest priority. The following declaration is intended to provide you with comprehensive information on (i) what data We collect, (ii) how We deal with it, and (iii) what rights you have. At the same time, We therewith fulfil Our duties imposed by the (Austrian) Data Protection Act 2000 and other statutory data protection regulations. This Data Protection Declaration applies to the use of our website ethpool.org ("**Website**").

Data protection laws are generally relevant in case any processing of personal data is concerned. The terms used within the scope of this data protection declaration are defined in and by the General Data Protection Regulation of the European Union. As such, the wide definition of "processing" of personal data means any operation or set of operations performed on personal data, such as, but not excluded to, recording, organization, storage, alteration, and transmission of personal data. Any information allowing Us or third parties to potentially identify you in person can be considered personal data. This terminology may also apply to IP addresses as long as they allow e.g. Internet Service Providers such identification.

1. Processing of Data

By accessing Our Website the external IP address of your computer as well as http specific information will be stored and logged for statistical, verification and organizational purposes (Art 6 para 1 lit f GDPR, legitimate interests of bitfly: technical website review and market research). IP addresses are stored for a period of 1 year, after which the data shall be deleted unless a longer time period is necessary for compliance with legal obligations.

Users may sign up to our service and as such indicate their email addresses voluntarily. Passwords that a user sets are never stored in clear text and are always protected by cryptographic primitives.

To use our staking service users are required to upload validator key(s) that allow us to perform validator duties as defined by the beacon chain. We do not however have access to the users funds. We process information about the users Validator(s) and their respective keys. If a user wishes to leave our service they can contact us and we will stop performing validator duties on behalf of the user, and will delete the Validator keys that were provided by the user.

In case you need any support regarding Our services, you may also submit support tickets. These support tickets should be created in our Discord accessible at https://dsc.gg/ethpool

For more generic requests please contact office@bitfly.at.

2. Rights of the Data Subject

A central aspect of data protection regulations is the implementation of adequate opportunities to allow for the disposition of personal data, even after the processing of said personal data has occurred. For this purpose, a series of rights of the data subject are set in place. bitfly shall comply with your corresponding requests to exercise your rights without undue delay and in any event within one month of receipt of the request. To ensure the exercise of your rights, we maintain a dedicated Email contact address at privacy@bitfly.at where all requests should be addressed to. Specifically, the following rights are entailed:

a) Right to information and access to personal data: should you exercise your right to information, We shall provide you with all relevant information regarding the processing of your personal data by bitfly, permitted to the extent of the law. As We are processing very little personal data in order to provide Our services, We may not be able to identify your person by any means. Thus, We may only be able to provide information by requesting additional data to verify your status. This may apply to the other rights of the data subject as well.

b) Right to rectification: with this right you may request the rectification of inaccurate or incomplete personal data (e.g. email addresses).

c) Right to erasure: We are obliged to delete personal data (name, email address) upon your request as you may withdraw your consent at any time.

d) Right to restriction of processing: restriction may be requested (i) for a verification period if the accuracy of the data is contested, (ii) if the processing is unlawful.

e) Right to lodge a complaint with a supervisory authority.

3. Data Security

bitfly will protect processed data adequately against unauthorized access (of third parties) in accordance with the provisions of the legal framework of Austria as well as the European Union. We will only process data which are essential to provide Our services. Measures are taken with regard to (i) the quantity of data collected, (ii) the extent of data processing, (iii) the storage time as well as (iv) the accessibility of data. Data will not be used or stored by other means than set out in this Data Protection Declaration and are made accessible only to a restricted and necessary number of persons. All employees of bitfly have been informed about applicable data protection provisions as well as data security measures and are bound to our privacy practices. Our web presence and other systems are adequately protected by a variety of security mechanisms. We do not transfer any personal data to third parties without prior explicit consent of the data subject.

4. Cookies

Cookies are small key-value text files that are stored by the users browser. These are used by Bitfly to provide a more user-friendly and secure service. Cookies allow Bitfly to provide the user with more functionality, and helps us communicate securely with the browser.

Cookies do not contain any personal information. The user has the option to refuse cookies at any time by selecting the appropriate option in the browser settings. However, it should be noted that the deactivation of cookies may reduce the services that we can offer and reduce user experience.

What different types of cookies are there?

To better understand why cookies are so important, we provide a brief overview of what types of cookies exist:

- Cookies, which are absolutely necessary
  help with the basic navigation on a website and the display of certain functions. Without this type of cookie, the core functionality and security of a website is not available. No consent is required for this type of cookie.
- Function and analysis cookies
  are used primarily for learning and analysis purposes to improve the comfort and experience of the website. This may also include the additional use of cookies from third parties such as Google Analytics.
- Advertising and social media cookies
  support the use of information collected on the website for the best possible user comfort and also for additional marketing purposes. As a result, this type of cookie is also called a "targeting cookie". The second type of cookie, which falls into this category, is suitable for performance purposes as it makes use more enjoyable in general and improves marketing messages. Finally, there are ways to share content with a community, such as blog posts, or interact between a website and a social media channel. These cookies are called "interaction cookies".

What cookies do we use?

Necessary Cookies: We use cookies to store settings made by the user, and to protect users from malicious actors. To display the correct currency we use a cookie named **currency**. We set a session cookie to authenticate users named **auth**. To prevent CSRF attacks we use a **_gorilla_csrf** cookie that stores a token sent with any POST request.

Functional Cookies: We do not use functional cookies.

Marketing: We do not use Marketing cookies

5. Third Party Providers
The following section describes the third party software used by our website.

5.1 Google Cloud

To provide our services we make use of google cloud products. We however control all of the information and google acts as a data processor. Google is certified that their service is designed to be secure and provide a high level of privacy for everyone. To learn more about google cloud and their privacy policy visit their page [here](#).

5.2 Cloudflare

To scale our service globally and to protect it from malicious actors we use cloudflare. Cloudflare resolves requests to our website and forwards them to our backend infrastructure. Further,

cloudflare distributes our service across the globe to make it easily accessible by everyone. To learn more about cloudflare's data privacy policy read up [here](#).

6. Links to websites of third parties

As far as the Website contains external links, we hereby indicate that these third-party websites are not subject to the influence and control of bitfly. We disclaim all liability for losses or obligations related to the use of these third-party websites. We are not responsible for the contents, availability, correctness, or accuracy of these websites, nor for their offerings, links, or advertisements.

7. Contact Details Regarding Data Protection Issues

In case you have any questions concerning bitfly's Data Protection Declaration or if you would like to exercise your right of information, rectification or deletion, please send us a written request outlining your desire to:

bitfly staking gmbh

Wiedner Gürtel 9

1100 Vienna, Austria

E-mail: privacy@bitfly.at