

## Privacy Notice

BitMEX ceased exchange operations on 23 September 2026 (the "Closure Date"). Following the Closure Date, the Terms of Service and this Privacy Notice govern the limited post-closure services available to existing account holders, which are restricted to: (a) accessing your account to view your wallet balance and transaction history; and (b) submitting a Withdrawal request. No new accounts may be opened. This Privacy Notice should be read in the context of the Closure Date and the cessation/wind-down of BitMEX exchange operations.

This notice describes how HDR Global Trading Limited and its affiliates (referred to as "HDR Group", "we" or "us" in this notice) will collect, make use of and share (i.e. "process") your personal data in connection with the BitMEX (an affiliate) website and services. For the purposes of this notice, the term "affiliate" shall mean any entity, individual, firm, or corporation, directly or indirectly, through one or more intermediaries, controlling, controlled by, or under common control with HDR Global Trading Limited.

This notice also describes data protection rights you may have (depending on applicable law), such as a right to object to some of the processing which the HDR Group carries out. More information about your rights, and how to exercise them, is set out in the "Your rights" section.

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### **1. Who is responsible for your personal information?**

Name: HDR Global Trading Limited, Suite 202, 2nd Floor, Eden Plaza, Eden Island, Mahe, Seychelles.

Privacy Officer contact details: [privacy@bitmex.com](mailto:privacy@bitmex.com)

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**Applicable jurisdictions:**

1. For users not based in the UK or the EU, please refer all queries to the Information Commission of Seychelles (IC):

Address: KLA Residence Victoria, Mont Buxton, Mahé, Seychelles

IC website: <https://www.infocom.sc/>

2. For the UK please refer to the Information Commissioner's Office (ICO).

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

ICO website: <https://www.ico.org.uk>

3. For the EU please refer to the Data Protection Commission (DPC)

Address: 21 Fitzwilliam Square South, Dublin 2, D02 RD28 Ireland

DPC website: <https://www.dataprotection.ie/>

**Our UK representative:**

Privacy Culture Limited

Address: Bouverie House, 154-160 Fleet Street, London, EC4A 2DQ

Email: [privacy@bitmex.com](mailto:privacy@bitmex.com)

**Our EU representative:**

Pembroke Privacy Limited

Address: 3-4 Upper Pembroke Street, Dublin 2

Email: [info@pembrokeprivacy.com](mailto:info@pembrokeprivacy.com)

We operate as a data controller when managing personal data that relates to the categories of data subject outlined below, our employees and internal operations.

We operate as a data processor when managing personal data on behalf of our customers.

**2. What personal information do we collect?**

We process personal data about you when you interact with us, our websites or our services

This includes:

- Your name, email address, username, password and other login and/or security details (e.g. passcode, two-factor authentication token seed record, public PGP key), and login records.
- Your payment or withdrawal details, including your wallet address(es).

- Your account and portfolio details, such as balances.
- Any personal data you submit for ID verification purposes, and your self-reported location (including browser location and other proof of address information) plus the geolocation of the IP address you connect from.
- Record of any consents, wallet addresses or approvals you have given us.
- The content and details (e.g. date) of messages that you send us (e.g. customer support queries).
- Customer service notes and other records.

We will aim to mark data fields as optional or mandatory when collecting personal data from you via forms. Note, where necessary fields you need to enter to prove your identity, the provision of personal data are typically mandatory: if relevant data is not provided, then we will not be able to provide the services you expect.

We do not collect fingerprints, facial recognition data, or other biometrics, other than photos and/or videos of yourself and/or your photo ID that you submit during our ID verification processes and which may be processed by facial recognition software for that purpose. Where you enable biometric security (such as fingerprint or Face ID login), your biometrics will be handled by your device, not by us.

### **3. How do we collect your personal information?**

- a) Information directly provided when you:
- Navigate the BitMEX website.
  - Withdraw your funds from the BitMEX website
  - Log in to your account.
  - Interact with our customer services team.

### **4. Why do we collect and use your personal information?**

We collect and use your data only for the following purposes:

- a) To fulfil a contractual obligation when we:
- Verifying your identity.
  - Paying out withdrawals.
  - Communicating with you.
  - Providing customer services.
- b) As required by the HDR Group or third parties to conduct their business and pursue their other legitimate interests, in particular:
- To provide services you have requested.
  - To monitor, improve and protect the services on our website and by learning from feedback and comments you provide.

- To personalise our website and services.
- By publishing de-identified records of market data, including trading records, on <https://public.bitmex.com>, for third party monitoring and research purposes.
- To monitor customer accounts to prevent, investigate and/or report misconduct such as spam, misrepresentation, security incidents, market manipulation or crime (such as fraud), in accordance with applicable law, and to cooperate with authorities seeking to do the same.
- To investigate any complaints received from you or from others.
- In connection with legal claims, compliance, regulatory or investigative purposes (including disclosure in connection with legal process or litigation).

c) To comply with legal obligations:

- We use and retain your personal information to prevent, detect, mitigate and investigate fraudulent or illegal activities.
- In response to requests by relevant courts and public authorities, such as those conducting an investigation.

d) Where you give us consent (so far as that consent is required):

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send or display marketing without your consent.

## 5. Your data protection rights

Under Data Protection laws you are entitled to exercise the following rights:

- Access: you have the right to request access to and/or a copy of your personal information;
- Rectification: you have the right to ask us to modify your personal information if you think it is inaccurate or incomplete. Please do not hesitate to contact us, so that we can keep your personal information up-to-date;
- Erasure: you have the right to request the deletion of the personal information we hold about you;
- Restriction: you have the right to ask us to limit the processing of your personal information;
- Data Portability: you have the right to request that your personal information is provided to you in a machine-readable format and directly transmitted to another controller if the processing is based on consent or contract;
- Object: you have the right to object to the processing of your personal information if it is based on legitimate or public interest;
- Automated decision-making: you have the right not to be subject to decisions based only on automated processing;
- Consent: you can withdraw your consent at any time by contacting our Privacy Officer at [privacy@bitmex.com](mailto:privacy@bitmex.com).

You may exercise your rights at any time by sending an email to [privacy@bitmex.com](mailto:privacy@bitmex.com).

## 6. How long do we retain your personal data?

Where we process personal data in connection with performing an agreement with you, we keep the data for 6 years from your last interaction with us.

Where we process personal data with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of that request indefinitely, so that we can continue to respect your request in future.

Customer identification, account records, and financial transaction logs are retained for 7 years following the end of the business relationship to comply with applicable Seychelles Financial Services Authority ("FSA") and Anti-Money Laundering ("AML") standards.

Longer retention periods may apply, such as where ongoing access to records continues to be important to our defence of legal claims or where we are required by law or regulation to retain information for specific periods.

## 7. Do we share your personal information?

We share your data with:

- Data between HDR Group companies so they can help deliver and improve our services, run our business, and comply with our legal obligations and related third party requests.
- Third parties in relation to services that can be accessed through or referred by BitMEX.
- Information on historical trades may also be shared with other trading platforms and exchanges.
- Courts or public authorities if required as described above, mandated by law or regulation, or required for the legal protection of our or third party legitimate interests, in compliance with applicable laws and regulations, and relevant / competent public authorities' requests.

Personal data will also be accessed by employees or contractors, or shared with third party service providers, who will process it on our behalf for the purposes identified above.

When sharing data with third parties, we will ensure that appropriate data sharing agreements are in place.

In the event that the HDR Group undergoes an acquisition, merger, reorganisation, asset sale of some or all assets under HDR's control or any other event whereby the BitMEX platform continues to operate, under alternative ownership, your details will be disclosed to our advisers, any prospective purchaser's advisers and to the new owners of the business. We will ensure that all disclosures are adequately protected, by putting in place the necessary organisational and technical measures in line with the relevant law. We will provide you with notice of any of these events.

## **8. International transfers**

Where your personal data is being transferred to countries outside the EEA and or UK either by us or by third party service providers acting on our behalf, we will ensure that those transfers are adequately protected, by putting in place the necessary organisational and technical measures, and guarantee the lawful processing of your personal information in accordance with the relevant law.

## **9. Security**

We take all appropriate technical and organisational measures to ensure that your personal information is protected, in compliance with our legal obligations. We protect your information using measures that reduce the risks of loss, misuse, unauthorised access, disclosure and alteration.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **10. Cookies**

Cookies are small text files downloaded on your computer when you visit web pages. We use cookies, web beacons and similar technologies to collect information about the pages you view, the links you click and other actions you take on our Services, within our advertising or e-mail content.

To make full use of the BitMEX website and its services, your computer, tablet or mobile phone will need to accept cookies, as we may only be able to provide you with certain features of this website by using them.

## **10. Privacy Notice updates**

We may revise this Privacy Notice from time to time. If we make a change to this notice that we consider material, we will take steps to notify users by a notice on the website. Your continued use of the BitMEX website and services (including API services) will be subject to the updated Privacy Notice.

This notice was last updated on 23 September 2026.

## **11. How to contact us**

If you have any questions or concerns about how we process your data, including if you would like to exercise any rights (e.g. to opt out of direct marketing), you can get in touch with our contact point for privacy queries at [privacy@bitmex.com](mailto:privacy@bitmex.com).