

PRIVACY POLICY

Last updated July 23, 2024

This privacy notice for Arquella (“we”, “us”, or “our”) describes how and why we might collect, store, use, and/or share (“process”) your information when you use our services (“Services”), such as when you:

- Download and use our mobile application (Arquella Active), or any other application of ours that links to this privacy notice.
- Engage with us in other related ways, including any sales, marketing, or events.

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you disagree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at customersupport@arquella.co.uk.

SUMMARY OF KEY POINTS

This summary provides key points from our privacy notice, but you can find more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

- **What personal information do we process?** When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use. Learn more about the personal information you disclose to us.
- **Do we process any sensitive personal information?** We do not process sensitive personal information.
- **Do we collect any information from third parties?** We do not collect any information from third parties.
- **How do we process your information?** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with the law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more about how we process your information.
- **In what situations and with which parties do we share personal information?** We may share information in specific situations and with specific third parties. Learn more about when and with whom we share your personal information.
- **How do we keep your information safe?** We have organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about how we keep your information safe.
- **What are your rights?** Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. Learn more about your privacy rights.

- **How do you exercise your rights?** The easiest way to exercise your rights is by visiting <https://www.arquella.co.uk/>, or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what we do with any information we collect? Review the privacy notice in full.

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1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services when you participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You: The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- Usernames
- Passwords
- Email addresses

Sensitive Information: We do not process sensitive information.

Application Data: If you use our application(s), we also may collect the following information if you choose to provide us with access or permission:

- **Mobile Device Access:** We may request access or permission to certain features from your mobile device, including your mobile device's calendar, camera, and other features. If you wish to change our access or permissions, you may do so in your device's settings.
- **Mobile Device Data:** We automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model, Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our application(s), we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID, and information about the features of our application(s) you accessed.
- **Push Notifications:** We may request to send you push notifications regarding your account or certain features of the application(s). If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

2. HOW DO WE PROCESS YOUR INFORMATION?

In short: We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with the law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- To save or protect an individual's vital interest. We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR PERSONAL INFORMATION?

In short: We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent:** We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. Learn more about withdrawing your consent.
- **Legal Obligations:** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- **Vital Interests:** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as in situations involving potential threats to the safety of any person.

In legal terms, we are generally the “data controller” under European data protection laws of the personal information described in this privacy notice since we determine the means and/or purposes of the data processing we perform. This privacy notice does not apply to the personal information we process as a “data processor” on behalf of our customers. In those situations, the customer that we provide services to and with whom we have entered into a data processing agreement is the “data controller” responsible for your personal information, and we merely process your information on their behalf in accordance with your instructions. If you want to know more about our customers’ privacy practices, you should read their privacy policies and direct any questions you have to them.

4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

In short: We may share information in specific situations described in this section and/or with the following third parties.

We may need to share your personal information in the following situations:

- **Business Transfers:** We may share or transfer your information in connection with or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates:** We may share your information with our affiliates, in which case we will require those affiliates to honour this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.
- **Business Partners:** We may share your information with our business partners to offer you certain products, services, or promotions.

5. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice unless a longer retention period is required or permitted by law (such as tax,

accounting, or other legal requirements). No purpose in this notice will require us to keep your personal information for longer than one year.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

6. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

7. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly collect, solicit data from, or market to children under 18 years of age, nor do we knowingly sell such personal information. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to delete such data from our records promptly. If you become aware of any data we may have collected from children under the age of 18, please contact us at customersupport@arquella.co.uk.

8. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: In some regions, such as the European Economic Area (EEA), United Kingdom (UK), and Switzerland, you have rights that allow you greater access to and control over your personal information.

In some regions (like the EEA, UK, and Switzerland), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your

personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (iv) if applicable, to data portability; and (v) not to be subject to automated decision-making. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us using the contact details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below.

We will consider and act upon any request in accordance with applicable data protection laws. If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Member State data protection authority or UK data protection authority.

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

Withdrawing your consent: If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us using the contact details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below. However, please note that this will not affect the lawfulness of the processing before its withdrawal nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent. If you have questions or comments about your privacy rights, you may email us at customersupport@arquella.co.uk.

9. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

10. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated 'Revised' date at the top of this privacy notice. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

11. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO) by email at customersupport@arquella.co.uk or contact us by post at:

Arquella
Data Protection Officer
Momentum House, Carrera Court
Dinnington
Sheffield, South Yorkshire S25 2RG
England

If you are a resident of the United Kingdom, we are the 'data controller' of your personal information. We have appointed Sarah Brammer to be our representative in the UK. You can contact her directly regarding our processing of your information by email at sarahbrammer@arquella.co.uk or by post to:

Momentum House, Carrera Court
Dinnington
Sheffield, South Yorkshire S25 2RG
England

12. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

You have the right to request access to the personal information we collect from you, details about how we have processed it, correct inaccuracies, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. To request to review, update, or delete your personal information, please visit: <https://www.arquella.co.uk/>.



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