

PRIVACY POLICY

1. WHO WE ARE

Arracca.com (**the Website**) and the Arracca App (**the App**) are operated by Arracca Ltd (Company Number: 13122841; Registered Office Address: 130 Old Street, London, England, EC1V 9BD) (**Arracca, we, us, our**).

We are in the process of launching current account services (via intermediaries) and a top-up debit card that reforests the planet with your everyday payments (the Services). These services will be provided via our Website and App and with the help of our partners. We are not a bank and we are not regulated by the Financial Conduct Authority or any other similar authority in any other jurisdiction. Regulated banking facility services will be provided to you on our behalf by our partners who are regulated in the jurisdictions they operate.

As of April 2021 we actively seek expressions of interest in our Services and as a result we need to collect certain personal data (also referred to as "personal information" and "information") about our prospective customers. This Policy explains how we handle personal data about our prospective customers.

This Policy does not apply to the actual provision of our Services which we plan to launch in December 2021. Prior to our Services launch you will receive our revised privacy policy, our terms of service and the terms of service of our partners who will be providing a regulated banking facility on our behalf. You will be required to read and agree to these terms before your information is passed on to our partners and before we are able to provide you our Services.

The submission of your personal data to us at this stage shall not be treated as a legal commitment at your end to receive our Services but as an expression of interest in our Services.

2. SCOPE & ACKNOWLEDGEMENT

This Policy applies to any personal data you submit to us via the Website or the App ("directly obtained information") or that you generate whilst browsing the Website or using the App and also to any other information about you that comes our way during our business development efforts ("indirectly obtained information").

By submitting personal data to us, you acknowledge that you have read this Policy and that we expect you to help us maintain your information accurate and up-to-date. We endeavour to bring this Policy to your attention everytime we obtain information directly from you. In all other circumstances we will bring this Policy to your attention the first time we reach out to you.

We would not task you for any information related to your health, religious/political/philosophical beliefs or racial background or any other sensitive matters, so please do not submit such information to us. We do not collect special category personal data or any protected classification characteristics. Our Services are not intended for minors, so if you are under 18, please do not submit any information to us.

We do not sell personal information and we do not pass on personal information to any parties who may sell it.



ARRACCA

A ZERO CARBON WORLD, POWERED BY YOU

3. MAIN PROCESSING ACTIVITIES

We process the following personal data:	For the following purposes:	On the following ground(s):
<p>Directly obtained information: any information you submit to us via the Website. This information includes your (user) name, password, contact details such as email address, physical address and mobile phone number, date of birth, your reasons why you may wish to use our Services and in what way you may use our Services and any other information you decide to submit via web forms or any other means.</p>	<ol style="list-style-type: none"> (1) We collect all this information for the primary purpose of ensuring the expressions of interest in our Services are genuine and suitable. (2) We collect email addresses for the purpose of maintaining correspondence with you in relation to the launch of our Services; (3) We collect physical addresses for the purpose of delivering your Arracca card should you decide to use our Services. (4) We collect usernames and passwords and we verify phone numbers in order to provide you access to a secure environment without our Website and App. (5) We collect dates of birth to ensure we do not offer or promote any Services to minors. (6) We collect your responses to a few questions regarding your intended use of our Services in order to potentially tailor these Services prior to their launch. (7) We may use email addresses for the purposes of targeted online advertisement via third parties. (8) We may use email addresses for the purposes of direct marketing. 	<p>(1) to (6) this collection is necessary for the purpose of entering in to a contract or Services with you should you wish to do this when our Services launch. Simultaneously, this collection is necessary for the purposes of our legitimate interests that are to assess genuine and suitable expressions of interests in our Services.</p> <p>(7) This processing is necessary for our legitimate interests that are to promote and raise awareness about our services. Where legally required, we will ask for your consent before undertaking this type of processing.</p> <p>(8) This processing will take place subject to your permission.</p>
<p>Indirectly obtained information: any information you generate whilst you browse our Website or use our App or whilst you read our direct marketing materials. This information is generated with the help of cookies and similar technologies and may include: browser type and version; operating system; the website from which you reach our website; date and time of access to our site; your IP address; your ISP, certain information about your device and other technical similar information that is capable of identifying you.</p>	<p>We may use information generated with the help of "cookies" and similar technologies for:</p> <ol style="list-style-type: none"> (1) the correct and efficient delivery of Website and App content; (2) ensuring the viability of information technology systems and Website and App technology; (3) analysis of the Website and the App any direct marketing material's performance and engagement; (4) optimisation of the Website and App content including its advertisement on search engines; (5) delivery (via third parties) of targeted advertising tailored to your interests. 	<p>(1) and (2) The processing of this information is necessary for our legitimate interests, namely ensuring the efficient, functional and safe delivery of the Website and the App and any direct marketing material.</p> <p>(3) The processing of this information is necessary for our legitimate interests, namely improving our Website and App. Where required by law, we will seek your permission to process this information.</p> <p>(4) and (5) For such processing we need your permission.</p> <p>You can exercise your choice with respect to cookies via the cookies pop-up on the Website. For the technical details of the cookies in use, please see the section on cookies and similar technologies below.</p>

4. PERSONAL DATA SHARING

We may share your personal data with the following recipients.

Recipient	For the following purposes:	On the following legal grounds:
Suppliers	We may disclose your personal data to our suppliers who help us provide running of our business, Website and App. Our suppliers may process your personal data on our behalf solely in accordance with our instructions and pursuant to a written contract. For example, we use suppliers for web hosting, secure cloud storage, analytics, email and SMS delivery, customer relationship management, fonts and other services. We also use suppliers such as social media companies and search engines in order to advertise the launch of our Services. We may share your email address or device ID with these suppliers.	This is either: (1) necessary for the purpose of entering in to a contract for Services with you should you wish to do this when our Services launch; or (2) necessary for the purposes of our legitimate interests that are to assess genuine and suitable expressions of interests in our Services; or (3) necessary for the purposes of our legitimate interests that are to promote the future launch of our Services. When none of the above applies, we will seek your permission in order to use a certain supplier with respect to your personal.
Advisors	We may disclose your personal data to our professional advisors that are usually regulated by a competent authority (lawyers, accountants, etc.) where that proves necessary.	This is necessary for the purposes of the legitimate interests that we pursue namely the proper administration of our business.
Authorities	We may disclose your personal data to the court service or regulators or law enforcement agencies in connection with proceedings or investigations where we are compelled to do so.	We would do this if we need to comply with a legal obligation or when in pursuit of our legitimate interests, namely the protection of our business.
Corporate restructuring	If we sell or buy any assets or business, we may disclose your personal data to the prospective seller or buyer of such business or assets. Conversely, if we are acquired by another business, personal information about our customers will be transferred to the buyer.	This is necessary for the purposes of the legitimate interests that we pursue, namely the proper administration of our business and our business' continued ability to provide our Website, App and Services.

5. TRANSFERS OF PERSONAL DATA IN AND OUT OF THE EUROPEAN ECONOMIC AREA AND THE UNITED KINGDOM ("EEA"; "UK")

The very nature of Internet communications means that at least some of the personal data processed by us and the parties we share it with will be transferred in and out of the EEA which is an area composed of countries offering a high standard of personal data protection pursuant to the General Data Protection Regulation (EU) 2016/679 which imposes certain restrictions on outbound transfers to most non-EEA territories. On the other hand, most non-EEA territories do not impose any restrictions on transfers of personal data to the EEA.

If you are residing in the EEA or in the UK your data transferred to our suppliers outside these territories will be protected with model data protection clauses approved by the European Commission. Please contact us if you would wish to have further details of the specific safe guards applied to the export of your personal data outside the EEA (where applicable)

6. YOUR RIGHTS OVER YOUR INFORMATION

We are committed to fulfilling the statutory data protection rights of our customers. These may vary depending on where you live. For example, if you reside in California and certain additional conditions apply, you may be entitled to the rights to know; delete; opt out and non-discrimination. You can learn more about these rights [here](#).

However, as a UK-based business we will respect your data subject rights enshrined in the General Data Protection Regulation (EU) 2016/679 no matter where you live. Please use the contact us button on our Website and App to exercise the following rights in respect of the personal data about you that we process:

to be informed;	to access;	to rectification;
to erasure;	to restrict processing;	to object to profiling;
to data portability;	to complain to your local data protection authority;	to withdraw consent.

Detailed information on the full content of your rights (and the conditions that apply) is provided by the United Kingdom's Information Commissioner's Office and is available on their website: <https://ico.org.uk/your-data-matters/>.

7. INFORMATION SECURITY

No data transmission over the Internet can be absolutely guaranteed to be secure from intrusion. Nevertheless, we maintain physical, electronic and procedural safeguards to protect personal data in accordance with data protection legislation requirements. We only use suppliers who undertake to maintain comprehensive Information Security Programs with effective administrative, technical, and physical safeguards capable of identifying, detecting, protecting against, responding to, and recovering from security incidents, and are certified against recognised security standards such as ISO/IEC27001, SOC2 and PCIDSS. We use the Google Cloud to store your data in the current phase of our business. Once we start offering our Services, and in case you chose to decide to use our Services, your information will be stored by our banking partners are certified against, among others, the Payment Card Industry Data Security Standard.

8. DATA RETENTION PERIOD

We shall retain your personal data until you request us to no longer hold it, unless we required to keep it by law. If your personal data becomes irrelevant for the purpose for which it was originally collected then we will securely dispose of it. As a general rule, we delete data about users who do not sign up to our Services Once these are made available, within 12 months of Service availability date. In all other cases, to determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Please note that the fore going does not apply to any personal data that has been irreversibly anonymised, meaning data rendered anonymous in such a manner that you are no longer identifiable from such data. Under the applicable law, such data is not deemed "personal" and maybe retained and shared indefinitely.

9. COOKIES AND SIMILAR TRACKING TECHNOLOGIES

Some cookies and similar technologies, particularly those that track users' browsing behaviour across the web are perceived by data protection regulators as privacy-intrusive. We are, therefore, presenting the below information to our Website visitors and direct marketing material recipients in order to explain why and how we use this technology.

Name of technology	Party serving the technology	Purpose of technology	Life span of technology on users' hardware
Google Analytics	Google Inc	Google's ability to use and share information collected by Google Analytics is restricted by the Google Analytics Terms of Service and the Google Privacy Policy. You may also learn more about how Google collects and processes data specifically in connection with Google Analytics. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on .	24 months
Facebook Pixel and Remarketing Service	Facebook Inc	Facebook's use of information collected is set forth in its Privacy Policy. You may opt out of Facebook's interest-based ads .	24 months

In addition to the controls provided on our Website via the pop-up, you can choose to block cookies by activating the settings on your browser that allow you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access parts of the Website. Your browser settings also allow you to delete all cookies stored on your device whenever you wish.

The UK Information Commissioner's Office provides the following guidance on controlling cookies:

- A number of Websites provide detailed information on cookies, including [AboutCookies.org](#) and [AllAboutCookies.org](#).
- The European Interactive Digital Advertising Alliance website [Your Online Choices](#) allows you to install opt-out cookies across different advertising networks.
- Google has developed a browser add-on to allow users to [opt-out of Google Analytics](#) across all websites which use it.
- Some browsers include a feature known as 'Do Not Track' or DNT. This allows you to indicate a preference that websites should not track you. However, whilst DNT is available in many browsers, websites are not required to recognise its request, so it may not always work. You can get help on how to use DNT in [Microsoft Edge](#), [Microsoft Internet Explorer](#), [Mozilla Firefox](#), [Google Chrome](#) and [Opera](#).
- For more information on how private browsing works as well as its limitations, visit the support pages for your browser: [Microsoft Edge](#), [Microsoft Internet Explorer](#), [Mozilla Firefox](#), [Google Chrome](#) and [Safari \(IOS \(mobile\) and desktop\)](#).

If you are concerned about online tracking then we can recommend you to:

- Install a privacy-friendly browser on your device, such as [Mozilla Firefox](#) or [Brave](#);
- Install anti-tracking and ad-blocking plug-ins on that browser, such as [Ad Block Plus](#), [Ghostery](#) or [Privacy Badger](#); and
- Use privacy-friendly web search engines, such as [Ecosia](#) or [Duck Duck Go](#).

If you have any questions about the cookies or similar technologies in use on our Website or App or in any direct marketing material, please use the contact us button on our Website and App.

10. CHANGES

We reserve the right to amend this Policy from time to time. Any changes we make in the future will be published on our Website and it is your responsibility to consult the Website regularly in order to acquaint yourself with such changes.

DATE OF LAST AMENDMENT
1st April 2021