

ARCSPIRE – DATA USE AND PRIVACY POLICY

INTRODUCTION

This **data use and privacy policy** is provided by ARCSPIRE LIMITED (Company Number: 10659256) whose registered office is at 22 Upper Ground London, SE1 9PD, and which company trades using the trading names and styles 'ARCSPIRE' and 'ARCSPIRE.IO' (plus such other trading names and styles as may be used from time to time) (referred to as **we, us** or **our**).

We (as part of our business) purchase digital media on third-party publishers' websites and apps - on behalf of our advertiser clients. We use such digital media as we may purchase to display our clients' adverts to the end-users of those websites and apps. So as to ensure that our clients' adverts reach people that are likely to be interested in such adverts, we use certain data about the digital media to determine how likely an end user is to be interested in a particular advert.

We use such data that we may receive from third-party publishers, advertising exchanges and supply side platforms (our **partners**), or which we collect ourselves through our website etc., to deliver targeted advertising, including location-based advertising and related insight services. As noted below, consumers have choices with respect to whether to allow targeted advertising on a device-by-device basis, and we seek to use all reasonable endeavours to honour those preferences.

We respect individuals' privacy and we are committed to protecting individuals' personal data. Personal data means any information about an individual from which that person (referred to as **you** or **your**) can be identified. It does not include data where the identity has been removed (anonymous data).

This data use and privacy policy has sought to have been prepared in plain English (and is provided with 'Headings' with the aim that you can easily review the specific areas set out below). Please also use the Glossary to understand the meaning of some of the terms used in this data use and privacy policy.

1. IMPORTANT INFORMATION

Purpose of this data use and privacy policy

This data use and privacy policy aims to give you information on how we may collect and process your personal data via our services or via your interaction with our business, including such personal data as you may provide to us through use of our websites etc., when you correspond with us or when you might otherwise provide us with your personal data (by any other means).

Our websites etc. are not intended for children and we do not knowingly collect any personal data relating to children.

We invite you to read this data use and privacy policy (together with any other data use and privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you) so that you are fully aware of how and why we are using your personal data.

This data use and privacy policy supplements any other notices and is not intended to override

them (unless specially specified so to do).

Controller

We are a controller and accept responsibility for your personal data.

We have appointed one of our Director's to be our data protection officer (**DPO**). They are responsible for overseeing questions in relation to this data use and privacy policy.

If you have any questions about this data use and privacy policy, including any requests to exercise your rights, please contact our DPO using the contact details as set out (from time to time) upon our web-page: <https://arcspire.io> or by an email sent to: team@arcspire.io.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, greatly appreciate the chance to initially deal efficiently and effectively with any of your concerns (before you might approach the ICO), so please contact us in the first instance.

Changes to this data use and privacy policy and your duty to inform us of changes

This version of our data use and privacy policy was last updated by reference to UK data protection law changes arising pursuant to the General Data Protection Regulation ((EU) 2016/679 **GDPR**), which came into force on Friday, 25th May 2018; with the accompanying provisions of the Data Protection Act 2018 (**DPA 2018**).

We strive to ensure that the personal data we hold about you is accurate and current. Accordingly, please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our websites or apps may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave any of our websites or apps, we encourage you to read the privacy policy of every website that you visit.

2. THE DATA WE COLLECT ABOUT CONSUMERS VIA OUR SERVICES

We may collect, use, store and transfer different kinds of personal data about consumers that we receive from our partners in the course of providing our services.

We do not collect ourselves or receive from our partners (or other third parties) any data (or other information) which directly identifies individuals (such as names, addresses, phone numbers or email addresses), and as such we do not identify an end user's actual 'real-world' identity via our technology.

We have grouped the data we receive from our partners (or other third parties) as follows:

- **Advert Data** including the size, shape and format of the advertising space for sale and its location on the webpage;
- **Publisher Data** including the website or app selling the space and the content on the page around it;
- **Device Data** including the device of the end-user looking at the websites or apps, including the make, model, operating system and language settings of the device and device-specific ids;
- **Connection Data** including connection type (e.g. Wi-Fi or 4G) and IP address of the end-user looking at the websites or apps;
- **Location Data** including the location of the device derived from either the Wi-Fi network the device is connected to or GPS data from the device. This may include precise location data provided by a mobile app provider who is responsible for ensuring you have provided consent for this data to be passed to us;
- **User Data** including information that the publisher selling the advertising space knows about the user such as their gender, age or segment information; and/or
- **Price Data** including the minimum price for that advertising space.

We do not have a direct relationship with the consumers whose data we receive from our partners or other third parties, and which we may process upon their behalf, so we rely upon our partners to ensure that the data that they has passed to us has been lawfully obtained, that the relevant consumers have been given notice as to how their personal data will be processed and that it may be passed to intermediaries (such as us) and that the relevant consumer has consented to such information sharing and processing. Accordingly, each partner or other third party is responsible for obtaining all applicable consents to enable our targeted advertising and other services to function.

3. THE DATA WE COLLECT ABOUT OUR CLIENTS AND VISITORS TO OUR WEBSITES ETC.

We may collect, use, store and transfer different kinds of personal data about our clients and visitors to our websites or apps - which we have grouped together as follows:

- **Identity Data** including first name, last name, marital status, title, date of birth and gender.
- **Contact Data** including billing address, correspondence/delivery address, email address and telephone number.
- **Financial Data** including bank account, payment card and electronic payment details.
- **Transaction Data** including details about payments to and from you and other details of products and/or services that you have purchased from us.
- **Technical Data** including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our websites or apps.
- **Profile Data** including your username and password, your interests, preferences, feedback and

survey responses.

- **Usage Data** including information about how you use our websites, apps., products and services.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and third parties and your communication preferences.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this data use and privacy policy.

We do not collect any **Special Categories of Personal Data** about you. This includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products and/or services). In this case, we may have to cancel any products and/or services you have contracted with us to provide, but we will notify you if this is the case at the time.

4. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about our clients and visitors to our websites or apps., including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products and/or services;
 - communicate with us via, or create an account on any of our websites;
 - subscribe to any of our publications;
 - request marketing materials to be sent to you;
 - enter a competition, promotion or survey; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with any of our websites or apps., we may automatically collect Technical Data as described above. We collect this personal data by using cookies, server logs and other similar technologies. Please see our [cookie policy](#) for further details.
- **Partners or other third parties.** We may receive personal data about you from our partners and other third parties (and public sources) based both inside and / or outside the EU - such as

those as are referred to above and/or as set out below:

- Device, Location, Connection and Technical data from the following parties:
 - (i) analytics providers;
 - (ii) advertising networks; and
 - (iii) search information providers.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from data brokers or aggregators.
- Identity and Contact Data from publicly available sources.

5. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to.

As regards consumers, whose data we receive from partners and other third parties (as referred to above), we generally rely upon your consent as provided via our partners or other third parties as a legal basis for processing such personal data.

As regards clients, we generally do not rely on consent as a legal basis for processing your personal data. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where we have your consent to send marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us via: team@arcspire.io

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we envisage using your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are in doing so (where appropriate).

Please note that we may process your personal data upon more than one lawful ground depending on the specific purpose for which we are using your personal data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing (including basis of legitimate interest)
THE DATA WE COLLECT ABOUT CONSUMERS VIA OUR SERVICES		
<p>For Information Storage and Access</p> <p>The storage of information, or access to information that is already stored, on your device such as advertising identifiers, device identifiers, cookies, and similar technologies.</p>	(a) Device	Consent
<p>For Personalisation</p> <p>The collection and processing of information about your use of our partners' websites and apps to subsequently personalise advertising and/or content for you in other contexts, such as on other websites or apps, over time. Typically, the content of the site or app is used to make inferences about your interests, which inform future selection of advertising and/or content.</p>	(a) Publisher (b) Device (c) Connection (d) Location (e) User	Consent
<p>For Ad Selection, Delivery, Reporting</p> <p>The collection of information, and combination with previously collected information, to select and deliver advertisements for you, and to measure the delivery and effectiveness of such advertisements. This includes using previously collected information about your interests to select ads, processing data about what advertisements were shown, how often they were shown, when and where they were shown, and whether you took any action related to the advertisement, including for example clicking an ad or making a purchase.</p>	(a) Advert (b) Publisher (c) Device (d) Connection (e) Location (f) User (g) Price	Consent
<p>For Content Selection, Delivery, Reporting</p> <p>The collection of information, and combination with previously collected information, to select and deliver content for you, and to measure the delivery and effectiveness of such content. This includes using previously collected information about your interests to select content, processing data about what content was shown, how often or how long it was shown, when and where it was shown, and whether you took any action related to the content, including for example clicking on content.</p>	(a) Advert (b) Publisher (c) Device (d) Connection (e) Location (f) User (g) Price	Consent
<p>For Measurement</p> <p>The collection of information about your use of the content, and combination with previously collected information, used to measure, understand, and report on performance.</p>	(a) Advert (b) Publisher (c) Device (d) Connection (e) Location (f) User (g) Price	Consent

THE DATA WE COLLECT ABOUT OUR CLIENTS AND VISITORS TO OUR WEBSITES ETC.

To register you as a new client	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver our service to you (as our client) including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you (as our client) which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how our clients use our products / services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how our clients use our products / services, to develop them and grow our business)
To administer and protect our business and our website(s) (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or

		group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how our clients use our products / services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website(s), products/services, marketing, client relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website(s) updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products / services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may establish a privacy centre where you can view and make certain decisions about your personal data use or the following personal data control mechanisms:

Promotional offers from us

For our clients and potential clients, we may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You may receive marketing communications from us if you have requested information from us or purchased products or services from us (or, for example, if you provided us with your details when you entered a competition or registered for a promotion) and, in each case, you have

not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside of us (or our group of companies) for marketing purposes.

Opting out

You can opt-out of targeted advertising and marketing from us (and others) at any time (by a variety of actions) including:

- accessing the privacy settings of your device or browser to stop the collection and use of data (from your device or browser) for advertising; or
- accessing the privacy settings on our partner's websites and apps to stop the collect and use of data for advertising; or
- accessing any privacy centre accessible from our websites or apps and checking or unchecking relevant boxes to adjust your marketing preferences; or
- by following the opt-out links on any marketing message sent to you; or
- by contacting us (at any time) via: team@arcspire.io.

Cookies

You can set your browser to refuse all (or some) browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website(s) may become inaccessible or not function properly. For more information about the cookies we use, please see [our cookie policy](#).

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to obtain an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us via: team@arcspire.io.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties (within the meaning - as set out in the *Glossary* below).
- External Third Parties providing a service we have purchased from them (Ditto).
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our

assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this data use and privacy policy.

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.

7. INTERNATIONAL TRANSFERS

Where relevant, we will ensure your personal data is protected by requiring any group companies to follow the same rules when processing your personal data. These rules are called "binding corporate rules". For further details, please websearch: '[European Commission: Binding corporate rules](#)'.

Whenever we process or transfer your personal data out of the European Economic Area (**EEA**), we shall ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see 'European Commission: Adequacy of the protection of personal data in non-EU countries'.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see 'European Commission: Model contracts for the transfer of personal data to third countries'.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield, which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see 'European Commission: EU-US Privacy Shield'.

Please contact us via: team@arcspire.io - if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

8. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our clients (including Contact, Identity, Financial and Transaction Data) for at least six (≥6) years after they cease being clients (for tax purposes).

In some circumstances, you can ask us to delete your data: see 'Request erasure' in the Glossary set out below for further information.

In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes - in which case we may use this information indefinitely without further notice to you.

10. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see the Glossary set out below to find out more about these rights.

If you wish to exercise any of the rights set out in the Glossary, please *contact us* via: team@arcspire.io.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee - if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. GLOSSARY

Lawful Basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by *contacting us*.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Third Parties

Internal Third Parties

Other companies in our group of companies (from time to time) based within the EEA (including those who may be acting as joint controllers or processors).

External Third Parties

- Service providers based within the EEA (such as those who provide IT and system administration services).
- Professional advisers and assistance service providers based in the EEA (including lawyers, bankers, accountants, auditors, insurers and consultants).
- HM Revenue & Customs, regulators and certain other public authorities based in the EEA.
- Certain other third parties, for example, market researchers, fraud prevention agencies, etc.

Your Legal Rights

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of such personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object

to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.