

RAUVA'S PRIVACY NOTICE

RAUVA (“**We**”, “**Our**”, “**Ours**”, “**Us**”) has procedures based on personal data protection policies that are established in accordance with EU Regulation No. 2016/679, of the European Parliament and of the Council, of 27 April 2016, on the protection of individuals with regard to the processing of personal data and the free movement of such data (hereinafter the “**Regulation**”). In this sense, this notice aims to allow the RAUVA to transmit the legally mandatory information in its capacity as Controller of the personal data collected about you as User of the RAUVA App and/or RAUVA Website.

1. DEFINITIONS:

The terms "personal data" "data subjects", "international organisation", "processing", "personal data breach", "data protection officer", "data controller" and "processor" referred to in this Privacy Notice shall correspond to the definitions provided in Article 4 of the Regulation.

In addition, we recall that this Privacy Notice must be read and interpreted in conjunction with the Terms and Conditions of Use of RAUVA Services. In all matters not expressly provided to the contrary in this Notice, the definitions set forth in the Terms and Conditions of Use of the Services shall apply. In particular, we recall the following definitions:

- A. **Agreement** – the subscription to the Terms and Conditions of Use of RAUVA Services, which makes you or your organization a Client;
- B. **Client** – a registered User which already accepted the Terms and Conditions of Use of RAUVA Services and benefits from RAUVA Services directly or as a legal representative of his/her organization;
- C. **RAUVA App** – the Application made available by RAUVA in the App Store and in the Play Store (which may be downloaded free of charge by any User) that allow Clients to have access to RAUVA Services;
- D. **RAUVA Website**: the website <https://rauva.com/>;
- E. **Services** – the Services provided by RAUVA to its Clients, which consist of providing, through the RAUVA App, an interface which seamlessly enables and aggregates Client’s access to certain financial and business-related services of its partners, via APIs, to give to you a “one-shop” digital solution for starting and managing your business, while also offering you additional business-related tools.
- F. **User** – the Clients and the natural persons who browse RAUVA’s website or download and explore RAUVA’s App but have not subscribed yet any RAUVA’s Services.

2. WHO IS THE CONTROLLER OF YOUR PERSONAL DATA?

Name: RAUVA PORTUGAL, UNIPessoal, LDA.
Address: Avenida Duque de Loulé, n.º 12, 1050-090 Lisboa
Email: support@rauva.com

3. WHICH CATEGORIES OF DATA WE COLLECT ABOUT YOU?

Browsing RAUVA's Website:

We will only process cookies under the terms that you have authorised us through our Cookies' Collection Tool and pursuant to our Cookies' Policy, which can be found on our website (www.rauva.com). In particular, and where you have expressly authorised us to do so, we may use data about your location.

Using RAUVA's App:

If you download RAUVA App, we will process the following personal data from you:

- User ID
- Country
- Region
- City
- Device type
- Operating system

If you register as a Client by accepting the Terms and Conditions of Use of RAUVA Services, in addition to the data pointed out above, we may also process the following personal data from you:

- Login Data (email and password)
- Identification data (name, surnames, passport number (or equivalent), taxpayer number, social security number)
- Contact data (address, email, telephone number)
- Location data (country, region, city)
- Tax data (NIF, Portal das Finanças sub User ID)

We may also need to process personal data from your shareholders, partners, employees, contractors and others to provide RAUVA Services to you or to your organization (“**Third-parties’ Personal Data**”). In that case, it is your responsibility to grant that you have obtained all necessary authorizations from those data subjects, or that you have legitimate grounds for processing their personal data and to share it with us.

4. FOR WHICH PURPOSES DO WE PROCESS PERSONAL DATA?

Performance of a contractual obligation

By subscribing to the Terms and Conditions of Use of RAUVA Services, the User is entering into an agreement with RAUVA as a Client. RAUVA therefore processes Clients' personal data strictly necessary to manage the contractual relationship between Client and RAUVA, so that Client may access the App and the Services provided therein.

If you do not provide us with the personal data required for the execution of the Agreement, we cannot provide you any of RAUVA Services.

Compliance with a legal obligation

Your personal data (and Third-Parties' Personal Data) may be used to allow RAUVA to comply with any legal obligation, including, without limitation, when RAUVA is notified by a supervisory authority or by a court for that purpose.

Consent

Upon your explicit consent, we may process your personal data for the following:

- Sending you promotional content from RAUVA, including, but not limited to, new features and releases of RAUVA Services;
- Using your location data to provide you with more accurate suggestions regarding RAUVA Partners you may wish to engage for additional Services;
- Sending you promotional content on behalf of or directly through RAUVA's Partners.

You may revoke any of your consents at any time and without any need for justification by using the “unsubscribe” option in our newsletters or by removing your permission for notifications or location in your device. You can also contact RAUVA through the contact information indicated above in this Privacy Notice.

Legitimate interest

RAUVA may also process your personal data under RAUVA's or a third party's legitimate interest. That is the case, for example, of:

- Processing your data for IT security purposes;
- Processing your data for RAUVA's Legal Defense;
- Making your personal data available (to the extent necessary) for market surveys for total or partial acquisition of RAUVA or of its Services by a third party, by means of capital increase, credit loan or through the transfer of shares.

In those cases, RAUVA will always seek that its legitimate interests do not override your interests or your fundamental rights in relation to the protection of your personal data.

5. WITH WHOM WILL WE SHARE YOUR PERSONAL DATA?

While providing RAUVA Services, and namely while acting as an intermediary between Clients and RAUVA's Partners, RAUVA will have to transmit your personal data and Third Party's Personal Data to the selected RAUVA's Partners (namely, for example, your identification data, your contact data, etc.). Please note that while your data is being processed by such RAUVA's Partners, such data processing activity shall be governed by the respective privacy notice, and not by the current Privacy Notice.

In particular, RAUVA may share personal data with:

- **Swan** – which will be providing you financial services – you can find Swan's privacy notice [here](#);

RAUVA may also share your personal data with other organizations, which shall process the data exclusively for the purposes identified above in 4, where such recipients will be acting on behalf and under the instructions of RAUVA. This is the case of RAUVA's own accounting partners, software supply and maintenance services, digital platform management companies, event promotion and management companies, financial consultants, lawyers, and others. RAUVA shall at all times procure that its suppliers adopt appropriate technical and organisational measures to protect your personal data.

It may also be necessary to share your personal data with potential buyers or investors in RAUVA. However, RAUVA will always ensure the principle of minimizing the processing of personal data and will subject any third parties accessing your personal data to confidentiality obligations.

About how we will process Third Party's Personal Data shared by you, please refer to our Data Processing Addendum in the Terms and Conditions of Use of RAUVA' Services.

6. WHERE DO WE PROCESS YOUR PERSONAL DATA?

RAUVA will seek to keep all personal data processed under RAUVA's Services in the European Economic Area ("EEA"). If RAUVA needs to transfer any personal data outside of the EEA, RAUVA will favor the use of third parties' countries which have an adequacy decision in force with the European Commission with regard to the transfer of personal data ("Whitelisted Countries"). If RAUVA needs to transfer personal data processed within RAUVA Services for any non-whitelisted country, RAUVA will ensure first that it has adopted appropriate additional safeguards for such transfer, such as the adoption of the EC Standard Contractual Clauses as timely approved by the European Commission.

7. FOR HOW LONG DO WE PROCESS YOUR DATA?

All personal data will be stored by RAUVA in accordance with the regulations in force to ensure compliance with legal obligations by RAUVA or to enable it to exercise its legal defense rights.

About registration data, and without prejudice to what is specifically provided by applicable law, all personal data you provide to us, including reviews, may be retained as long as you or your organization maintain your Agreement active with RAUVA. Please note, however, that RAUVA has no obligation to store such data, nor does RAUVA assume any obligation before you to store such data or to back up such data.

If the User does not access the Services for a period exceeding twelve (12) months, RAUVA holds the right of deleting such User's data, unless RAUVA considers that such records are necessary for the exercise of RAUVA's legal defense or other rights.

If you need to obtain further information regarding the storage periods of your data with RAUVA, please contact us through any of the contact details in 2 above.

8. WHAT ARE YOUR RIGHTS AS A DATA SUBJECT?

Right of access

You have the right to request information from RAUVA about the personal data we process about you.

Right to rectification

You have the right to request RAUVA to rectify your personal data if they are incorrect, as well as the right to complete such data if and when incomplete. However, we remind you that through the "My Account" tab, you may rectify most of your identification data.

Right to portability

Where RAUVA processes personal data about you by automated means or on the basis of your consent or within a contract, you have the right to ask RAUVA for a copy of that personal data in a structured, commonly used and machine-readable format, or to request it to be transferred to another controller indicated by you.

Right to erasure

You may request RAUVA to erase your personal data. Please note, however, that such erasure may not be immediate where RAUVA wishes to safeguard any of its rights of defense. We will always keep evidence regarding your request for erasure.

Right to object

You have the right to object to the processing of your personal data where RAUVA bases the processing on the legitimate interest of RAUVA or a third party.

Right to restriction of processing

You may request the limitation of the processing of your personal data when you contest their accuracy, consider that the processing is unlawful (and you have not requested their erasure), understand that they are no longer necessary for the processing purposes described by RAUVA in this Privacy Notice or when you have objected to their processing and until deciding on the legitimacy or otherwise of their processing by RAUVA.

9. HOW CAN YOU EXERCISE YOUR RIGHTS?

If you believe RAUVA has not complied with any of the personal data processing provisions of this policy or of the Regulation, or in case you wish to exercise any of your rights, you can contact RAUVA by any of the contact details referred in 2 above.

You may always fill a complaint before a data supervisory authority if you feel your requests have not been properly addressed. You may find a list of all data protection authorities in Europe [here](#).

Please note that RAUVA reserves the right to, at any time, amend, update, revoke or replace this Privacy Notice. If the amendments are material, we will provide you with a prior notice.

Version dated of April 2023