

# Auka Privacy Policy

*This privacy policy is effective from November 20, 2019.*

When we refer to "Auka," "we," or "us" in this policy, we mean Auka AS, which controls the information we collect, use, disclose, transfer, store, retain or otherwise process when you (whether you are a person or corporate entity):

- (i) sign up for an account through Auka's mobile payment platform ("Service"),
- (ii) access our websites; auka.io, settle.eu or any such sites hosted under these domains ("Website"), or
- (iii) express consent for us to use your personal data for marketing and any other stated purpose.

(i)-(iii) together are also referred to as "Services".

This privacy policy applies to your use of our Services, and covers information collected in connection with your access to and use of our Services.

In order for you to use our Services, we need to receive, store, process and use your personal information. It is therefore important that you read this Privacy Policy before using any of the Services.

This privacy policy explains:

- What information we collect about you
- What is the legal basis of such collection
- How we collect your information
- How we use your information
- How we share your information
- How long we retain your information
- Storage and security of your information
- Cookies and data analytics tools we use
- Your rights
- International data transfers
- Changes to this privacy policy
- Your right to complain
- Contact details

## 1. Introduction

Your privacy is important to us, and so is being transparent about how we collect, use and share information about you. This policy is intended to help you understand how your information is used, stored and managed. We collect certain information about individuals to provide you and others with the Services and support for those Services. These individuals can include customers, suppliers, business contacts, employees and other people Auka has a relationship with or may need to contact. The type of information we collect can vary depending on the country from which you access our Services. Additionally, you can choose to voluntarily provide information to us. This policy describes how this personal data is collected, handled and stored to meet the company's data protection standards and to comply with the law.



## 2. What this policy covers

We collect the information you provide when you apply or sign up for the Service, go through our identity or account verification process, authenticate into your account, communicate with us, answer our questions, or otherwise use the Services, including visiting our Website.

This policy explains your choices about how we use information about you for marketing and other purposes. Your choices include how you can object to certain uses of information about you and how you can access and update certain such information.

If you do not agree with this policy, you may not access or use our Services, or interact with any other aspect of our business.

**We have included specific explanations and examples in this privacy policy to help you better understand when and how we work with your data and your choices regarding applicable data use and sharing.**

## 3. Legal bases for processing

We collect and process information about you only where we have legal bases for doing so under applicable laws. The legal bases depend on the Services you use and how you use them. This means we collect and use your information only where:

- We need it to provide you with the Services, including to operate the Service, provide customer support, personalized features and to protect the safety and security of you, other users and our Services,
- It satisfies a legitimate interest (which is not overridden by your data protection interests), which may include research and development, to market and promote the Services and to protect our legal rights and interests,
- You give us consent to do so for a specific purpose, or
- We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party has a legitimate interest to do so, you have the right to object to that use, though in some cases this may mean no longer using the Services.

## 4. What information we collect and sources

We collect information about you when you provide it to us, and when other sources provide it to us, as further described below. This information is necessary for us to provide the Service to you and to allow us to comply with applicable regulations, including but not limited to anti-money laundering, counter terror financing and tax laws. Without it, we will not be able to provide you with the requested Service.

### a. Information you provide to us

We collect information about you when you use our Service or otherwise provide it directly to us. The information that we collect from you includes:

- Account and profile information you provide us when you register for or use our Services, such as:



- Identification information. The minimum information for the Service to operate is: your name and surname, phone number, authentication credentials (for example, information you use to login to your account), IP address, when you apply or sign up for an account or other Services and financial information, such as bank account or payment card number. We collect certain payment and billing information when you register for Service.
- Transaction information. When you use our Service to make, accept, request, or record payments, we collect information about when and where the transactions occur, the names of the transacting parties, a description of the transactions, the payment or transfer amounts, billing and delivering information, and the devices and payment methods used to complete the transactions.
- Information you provide to enhance your experience
  - You can choose to provide us with additional information in order to obtain a better user experience when using our Services. However, such information is not compulsory and not required for the Service to operate. This additional information will be processed with your consent and/or to provide you with the Services you request and may include your address or a profile picture.
  - Content you provide through our Websites. We collect other content that you submit to our Website, including email provided while subscribing for the newsletter and other personal information voluntarily provided, subject to separate consents.
  - Information you provide through our support channels. The Services also include customer support, where you may choose to submit information regarding a problem you are experiencing with a Service.
- Information we collect automatically when you use the Services or Website. We collect information about you when you use our Service, browse our Websites or taking actions within the Services
  - Your use of the Service. We keep track of certain information about you when you visit and interact with our Service. This information includes the features you use and how you interact with other users on the Service.
  - Device and Connection Information. We automatically collect information about you and the devices you use to access the Services, such as your computer, mobile phone, or tablet including your hardware model, hardware branding, operating system and version, and information about the device's interaction with our Service to pursue our legitimate interest, in particular:
    - to provide, improve, develop and protect our content, Service and other Services,
    - to personalise our Website and other Services for you,
    - to use third parties to check the validity of the account number and card number you submit in order to detect and prevent fraud, and
    - to monitor accounts to prevent, investigate and/or report potential financial crimes, misrepresentation, security incidents or crime, in accordance with applicable laws.
  - Use Information. Information about how you use our Service, including your access time, "log-in" and "log-out" information, browser type and language, country and language setting on your device, Internet Protocol ("IP") address, the domain name of your Internet service provider, other attributes about your browser and data about the way you interact with our Services.



- Geolocation Information. The location of your device and location of your network provider. You can disable collection of location information by changing the preferences on your mobile device or uninstalling the Service from your device.

b. Information we receive from other sources

We collect information from other sources and combine that with the information we collect from you. We do not control, supervise or are not responsible for how the third parties (providing your information) process your personal data, and any information request regarding the disclosure of your personal information to us should be directed to such third parties.

The information we collect about you from third parties includes:

- Other users of the Service. Other users of our Service may provide information about you when they submit content through the Service. For example, you may be mentioned by someone as a recipient of payment. We also receive your phone number from other Service users when they provide it in order to invite you to the Services.
- Identity verification. Information from third-party verification services (e.g. credit reference agencies, identity verification agencies (if you authorise us to do so) and through companies which provide third party analytics (see section on cookies and data analytics), credit bureaus, financial institutions, mailing list providers, and other publicly available sources. In some circumstances, where lawful, this information can include your government-issued identification information. We do this identity verification check for the purpose of anti-money laundering, identity verification, and fraud detection and prevention.
- Background information. Subject to applicable laws, we can obtain background check reports from public records to ensure the safety and security of our platform and its users. We can use your information, including your full name, government-issued identification number, address and date of birth, to obtain such reports.
- Credit, compliance and fraud. We can collect information about you from third parties in connection with any credit investigation, credit eligibility, identity or account verification process, fraud detection, or collection procedure, or as may otherwise be permitted and/or required by applicable law, this includes, without limitation, the receipt and exchange of account or credit-related information with any credit reporting agency or credit bureau, where lawful.
- Other services you link to your account. You may authorize our Service to access and display information from a third-party service within the Service interface. Or you may authorize our Services to sync a contact list from your phone so that you can transfer money to those contacts within the Service and/or invite them to use our Service. The information we receive when you link or integrate our Service with a third-party service depends on the settings, permissions and privacy policy controlled by that third-party service. You should always check the privacy settings and notices in these third-party services to understand what data may be disclosed to us or shared with our Services.
- Auka authorised partners. We work with a global network of partners who provide consulting, implementation, training and other services around our Service. Some of these partners also help us to market and promote our Services, generate leads for us, and resell our Service. We receive information from these partners, such as billing information, billing and technical contact information, company name, what products you have purchased, evaluation information you have provided, what events you have attended, and what country you are from.



- Other partners. We receive information about you and your activities from third-party partners, such as advertising and market research partners who provide us with information about your interest in, and engagement with, our Services and online advertisements.

## 5. How we use collected information

We collect information about you when you request to engage with our Services for a variety of uses based on different reasons. For example, some of the information we collect from you we need to enable use to deliver the Services to you, sometimes we are required by law and regulations to collect and process this information about you, at other times, we consider it is in our legitimate business interests to collect and process this information, taking into consideration your privacy right.

How we use the information we collect depends on which Services you use, how you use them, and any preferences you have communicated to us, that also refers to the marketing and PR purposes and our sales activities. Below are the specific purposes for which we use the information we collect about you.

We use information about you for a number of purposes:

### a. Providing our Services

- Processing or recording payment transactions or money transfers, and otherwise providing you with the Service and features you choose to use. We need this information in order to fulfil our obligations. Without this information we would not be able to provide the Services requested by you. Information required for these reasons include:
  - Identification Information,
  - Transaction Information, and
  - Contact Information.
- Displaying historical transaction or appointment information. We will provide information regarding your transaction history, including monthly account statements. We therefore need to collect and process this information to satisfy our obligations.
- To personalize your experience. For marketing purposes, we may use your email domain to infer your affiliation with a particular organization or industry to personalize the content and experience you receive on our Website.
- Providing, maintaining and improving our Services. It is in our legitimate business interests to continue to maintain our Service and other Service offering to individuals in order to keep running our business.
- Customer support. We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyze crash reports, and to repair and improve the Service and other Services. Where you give us permission to do so, we share your information for the purpose of responding to support-related requests.

### b. Improving and developing our Services

- For research and development. We are always looking for ways to make our Service and other Services smarter, faster, secure, integrated and useful to you. We use collective learnings about how people use our Services and feedback provided directly to us to troubleshoot and to identify trends, usage, activity patterns and areas for integration and improvement of the Services. For example, we test and analyze certain new features with some users before rolling the feature out to all users.



- Developing new products and services. It is in our legitimate business interests to continue to improve our Service and design new services in order to develop and grow our business.
- Delivering the information and support you request, including: technical notices, security alerts, support and administrative messages including to resolve disputes, collect fees, and provide assistance for problems with our Services or your account in our Service. We need to communicate with you to fulfil our own obligations or meet your requests and we need your identification information in order to deliver this information to you. If you do not provide this information, we will not be able to fulfil our obligations or meet your requests.
- Improving, personalising and facilitating your use of our Services.
- Measuring, tracking and analysing trends and usage in connection with your use or the performance of our Services. We want to understand how current Services are used in order to develop and enhance our products in our legitimate interests. In order to ensure that our legitimate business interests of striving to deliver a consistent, secure and continuous service are met, we need to carry out certain analytics on the performance of our Services.
- Product development and creation. We can process the information you provide to us, the information we collect from your use of our Services and the information we obtain from third parties automatically to improve our Service and other Services and develop new products. The information we use will help us to understand what is important to our users, and how we can create better Services.

c. To communicate with you about the Service and our activities

- Sending you information we think you may find useful or which you have requested from us about our Services. We send you information about Services you use because it is in our legitimate interest to do so. We will only send you notifications regarding promotional information where we have your consent to do so.
- Conducting surveys and collecting feedback about our Services. We do this to pursue our legitimate interests to understand if the Services are helpful to you and to evaluate the effectiveness of any updates we provide.
- We use your contact information to send transactional communications via sms or email and within the Service, including confirming your purchases, questions and requests, providing customer support, and sending you technical notices, updates, security alerts, and administrative messages. Depending on your settings, we send you email notifications when you or others interact on the Service, for example, when you are mentioned as a recipient of payment. We also provide tailored communications based on your activity and interactions with us. For example, certain actions you take in the Service may automatically trigger a sms suggestion for third party to download the Service in order to receive payment you sent. We also send you communications as you onboard to a particular feature in the Service to help you become more proficient in using that Service. These communications are part of the Service and in most cases you cannot opt out of them. If an opt out is available, you will find that option within the communication itself or in your account settings.

d. Protecting our Service and maintaining a trusted environment

- Identity verification. We engage in profiling and automated processing, both directly and through the use of third party identification verification services, to verify your identity (so we can confirm you appear to be who you say you are). We set out more information on this above and how this



affects you. If we cannot identify you, we may not be able to provide the Services to you. This identity verification check will be based on the information you provide to us and the results we get from the third party verification services (which is limited to the result of the check).

- Fraud and crime detection and prevention. We have developed processes, for the purposes set out above, to check that our Service is not being used for fraudulent purposes. We will consider the information you provide to access our Platform, information you provide to enhance your experience, information we automatically collect from your use of our Services, and information we collect from other sources to mitigate potential or actual fraud. We regularly check that our processes are up to date and implemented robustly and fairly to ensure that we can deliver the Services to you and that they are safe to use. If we believe in good faith that that you potentially committing a financial crime including fraud, we may not be able to provide the Services to you.
- For our customers', or your customers' (if applicable) rights, security or integrity of our Services. We do this as we are required by law and in our legitimate interest to prevent our Services being misused for fraudulent activities.
- Enforcing applicable agreements or policies, when necessary in order to fulfil our obligations.
- Complying with any applicable laws or regulations, or in response to lawful requests for information from the government or through legal process. We do this as required by law.
- Contacting you to resolve disputes, collect fees and provide assistance with our Services. We process this information given our legitimate interest providing you with our Services, to measure the adequate performance of our contract with you, and to comply with applicable laws.
- For safety and security. We use information about you and your Service use to verify accounts and activity, to monitor suspicious or fraudulent activity and to identify violations of the Service policies.
- To protect our legitimate business interests and legal rights. Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

e. Advertising and marketing

- Marketing. with your consent we can process the information you provide to us, the information we collect from your use of our Services and the information we obtain from third parties automatically to market new products and services to you by using cookies to serve ads to you or by delivering adverts in our applications or on our websites.
- To market, promote, and drive engagement with the Service. We use your contact information to send tailored communications that we believe are of specific interest to you, by email, and cross promoted on platforms such as LinkedIn, Facebook and Google. This communication is aimed at driving engagement and maximizing what you get out of the Service, including information about new features, survey requests, newsletters, and events we think may be of interest to you. You can control whether you want to receive this type of communication as described below under "Opt-out of communications".

We will only process your information for these purposes where we have your consent to do so.

f. Other Uses

- For any other purpose disclosed to you in connection with operation of our Service or other Services from time to time. If we intend to process your personal data for a purpose other than that set out





above, we will provide you with information prior to such processing and will obtain your consent where necessary.

- Some of our processes for how we use your information can involve profiling, automated processing and automated decisions. We need to do this to meet our own contractual obligations, to comply with applicable law (i.e., for fraud prevention purposes or where we have a good faith belief we are under a legal or regulatory obligation to do so), and as it's in our legitimate business interests to engage in such automated processing.
- With your consent. We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories to promote the Service, with your permission.

## 6. Sharing of collected information

We make collaboration tools, and we want them to work well for you. This means sharing information through the Service and with certain third parties. We share information we collect about you in the ways discussed below, including in connection with possible business transfers, but we are not in the business of selling information about you to advertisers or other third parties.

### a. Sharing with other Service users

- With other users of our Service with whom you interact through your own use of our Services. This is necessary to provide our Services to you and fulfil our obligations, as well as in our legitimate interest to do so. For example, we share information when you make or accept a payment or money transfer using our Service.

### b. Sharing with third parties

We share information with third parties that help us operate, provide, improve, integrate, customize, support and market our Service.

- With third parties to provide, maintain, and improve our Service and other Services, including service providers who access information about you to perform services on our behalf (e.g., fraud prevention, identity verification, and fee collection services), as well as financial institutions, payment networks, payment card associations, credit bureaus, partners providing services on Auka's behalf, and other entities in connection with Services.
- With third parties that run advertising campaigns or other events or activities in connection with our Services but only subject to your express consent.
- Service Providers. We work with third-party service providers to provide website and application development, hosting, maintenance, backup, storage, virtual infrastructure, payment processing, analysis and other services for us, which may require them to access or use information about you. If a service provider needs to access information about you to perform services on our behalf, they do so under instruction from us, including abiding by policies and procedures designed to protect your information.
- Auka authorised Partners. We work with third parties who provide consulting, sales, support and technical services to deliver and implement customer solutions around the Services. We may share your information with these third parties in connection with their services, such as to assist with billing and collections, to provide localized support, and to provide customizations.





- Links to third-party sites. The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. Your use of and any information you submit to any of those third-party sites is governed by their privacy policies, not this one.
  - With your consent. We share information about you with third parties when you give us consent to do so. For example, we often display personal testimonials of satisfied customers on our public websites. With your consent, we may post your name alongside the testimonial.
- c. Sharing with affiliated companies
- Because it is in our legitimate interest to do so, we reserve the right to disclose and transfer all information related to the Services, including personal information:
    - To a subsequent owner, co-owner, or operator of one or more of the Services; or
    - In connection with (including, without limitation, during the negotiation or due diligence process of) a corporate merger, consolidation, or restructuring; the sale of substantially all of our stock and/or assets; financing, acquisition, divestiture, or dissolution of all or a portion of our business; or other corporate change. You will be notified via email and/or a prominent notice on the Services if a transaction takes place, as well as any choices you may have regarding your information.
- d. Safety and compliance with law
- If we believe that disclosure is reasonably necessary:
    - (i) to comply with any applicable law, regulation, legal process or governmental request (e.g., from tax authorities, law enforcement agencies, etc.);
    - (ii) to enforce or comply with our terms or other applicable agreements or policies;
    - (iii) to protect our or our customers' rights or property or the security or integrity of our Services; or
    - (iv) to protect us, users of our Services or the public from harm, fraud, or potentially prohibited or illegal activities, or
    - (v) respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.
  - With your consent - for example: at your direction or as described at the time you agree to share or when you authorise a third party application or website to access your information.

## 7. Storage and security of collected information

### a. Information storage and security

We use a cloud hosting provider to store the information we collect, and we as well as the cloud hosting provider use technical measures to secure your data. While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others. We will respond to requests about this within a reasonable timeframe.

### b. How long we keep information

- We generally retain your information only as long as reasonably necessary to provide you the Services or to comply with applicable law.



- How long we keep information we collect about you depends on the type of information, as described in further detail below. After such time lapses, we will either delete or anonymize your information or, if this is not possible (for example stored data that we are required to keep due to the financial supervisory requirements), then we will securely store your information and isolate it from any further use until deletion is possible.
- Account information. We retain your account information until you delete your account from the Service. We also retain some of your information as necessary to comply with our legal obligations, due to financial supervisory requirements, to resolve disputes, to enforce our agreements, to support business operations and to continue to develop and improve our Service. Where we retain information for Service improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Service, not to specifically analyze personal characteristics about you.
- Information you share on the Service. If your account is deactivated or disabled, some of your information and the content you have provided will remain in order to allow your team members or other users to make full use of the Service.
- Marketing information. If you have opted in to receive marketing emails from us, we retain information about your marketing preferences unless you specifically ask us to delete such information. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

## 8. Your rights

If you reside in Europe or your activities connected with Services take place in Europe, you have certain choices and rights available to you when it comes to your information. Below is a summary of those choices, how to exercise them and any limitations. We will respond to requests about this within a reasonable timeframe. You have the right to:

- be provided access to your personal data held by us,
- request the rectification or erasure of your personal data held by us,
- request that we restrict the processing of your personal data (while we verify or investigate your concerns with this information, for example);
- request a copy of your personal data in a structured, electronic format also to be transferred to a third party (data portability),
- object to our use of your personal data (including for marketing purposes),
- request the deletion or restriction of your personal data,
- object to profiling activities based on our own legitimate interests, and
- object to solely automated processing.

In addition, where you have provided your consent to our processing of personal data, you can withdraw this at any time.

Below, we describe the tools and processes for making these requests. You can exercise some of the choices by logging into the Service and using settings available within the Service or your account. Where the Service is administered for you by a provider (see "Notice to End Users" below), you may need to contact your provider to assist with your requests first. For all other requests, you may contact us as provided in the Contact Us section below to request assistance.

Your request and choices may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we are permitted by law or have compelling legitimate interests to keep. Where you have asked us to share data with third



parties, you will need to contact those third-party service providers directly to have your information deleted or otherwise restricted. If you have unresolved concerns, you may have the right to complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed.

Our Service and related documentation give you the ability to access and update certain information about you from within the Service. For example, you can access your profile information from your account in the Service. You can update your profile information within your profile settings and modify content that contains information about you using the editing tools associated with that content.

Our Service and related documentation give you the ability to delete certain information about you from within the Platform. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.

In some cases, you may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. For example, if you believe an account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this policy. Where you gave us consent to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time. You can also opt-out of our use of your information for marketing purposes by contacting us, as provided below. When you make such requests, we may need time to investigate and facilitate your request. If there is a delay or dispute as to whether we have the right to continue using your information, we will restrict any further use of your information until the request is honored or the dispute is resolved, provided your administrator does not object (where applicable). If you object to information about you being shared with a third-party app, please disable the app or contact your administrator to do so.

You may opt out of receiving promotional communications from us by using the unsubscribe link within each email, updating your email preferences within your Service account settings menu , or by contacting us as provided below to have your contact information removed from our promotional email list or registration database. We may need to verify your identity before granting access or otherwise changing or correcting your information. Even after you opt out from receiving promotional messages from us, you will continue to receive transactional messages from us regarding our Service. You can opt out of some notification messages in your account settings.

Data portability is the ability to obtain some of your information in a format you can move from one service provider to another (for instance, when you transfer your mobile phone number to another carrier). Depending on the context, this applies to some of your information, but not to all of your information. Should you request it, we will provide you with an electronic file of your basic account information.

## **9. Cookies and data analytics**

We use various technologies to collect information when you access or use our Services, including placing a piece of data, commonly referred to as a “cookie,” or similar technology on your device and using web beacons. Cookies are small data files that are stored on your hard drive or in your device memory when you visit a website or view a message. Among other things, cookies support the integrity of our registration process, retain your preferences and account settings, and help evaluate and compile aggregated statistics about user activity. We begin collecting information about you or from activity on devices you use as soon as you use our Services. By using our Services, you permit us to collect and use



your information from activity on devices you use to utilise Services. For more information and to learn how to block or delete cookies used in the Services, please see below.

Certain cookies we use last only for the duration of your web or application session and expire when you close your browser or exit the application. Other cookies are used to remember you when you return to use the Services and, as such, will last longer.

We use cookies to:

- Remember that you have visited us or used our Services before. This allows us to identify the number of unique visitors we receive, so that we can provide enough capacity to accommodate all of our users,
- Customise elements of the layout and/or content of our Service,
- Collect data about the way you interact with our Services (e.g., when you use certain features or download materials),
- Collect data to assess and improve our advertising campaigns, including sending information to our business partners,
- Allow our business partners (including third parties) to use these tracking technologies to track your behaviour on our behalf on our Platform (including when you use multiple devices) and on partner websites,
- Enable third parties to collect data about the way you interact across sites outside of our Services, or
- Collect anonymous statistical information about how you use the Website (including the length of your web or application session) and the location from which you access the Services, so that we can improve the Services and learn which elements and functions of the Services are most popular with our users.

Some of the cookies used in the Services are set by us, and others are set by third parties who deliver services on our behalf.

Most web and mobile device browsers are set to automatically accept cookies by default. However, you can change your browser settings to prevent automatic acceptance of cookies, or to notify you each time a cookie is set.

Please note, however, that by blocking or deleting cookies used in the Services, you may not be able to take full advantage of the Services.

We also collect information using web beacons. Web beacons are electronic images that can be used in our Services or emails. We use web beacons to deliver cookies, track the number of visits to our website, understand usage and campaign effectiveness, and determine whether an email has been opened and acted upon.

We can use third-party service providers to provide site metrics and other analytics services. These third parties can use cookies, web beacons, and other technologies to collect information, such as your IP address, identifiers associated with your device, other applications on your device, the browsers you use to access our Services, webpages viewed, time spent on webpages, links clicked, and conversion information (e.g., transactions entered into). This information can be used by Auka and third-party service providers on behalf of Auka to analyse and track usage of our Services, determine the popularity of certain content, and better understand how you use our Services. The third-party service providers that we engage are bound by confidentiality obligations and other restrictions with respect to their use and collection of your information.

This privacy policy does not apply to, and we are not responsible for, third-party cookies, web beacons, or other tracking technologies, which are covered by such third parties' privacy policies. For more



information, we encourage you to check the privacy policies of these third parties to learn about their privacy practices.

Examples of our third-party service providers to help deliver our Services or to connect to our Services include:

- Google Analytics. We use Google Analytics to understand how our Services perform and how you use them. To learn more about how Google processes your data, please visit <https://www.google.com/policies/privacy/>.
- Facebook. We use Facebook to advertise and market our services, and to enable our customers to market their services. To learn more about how Facebook uses your data please visit <https://en-gb.facebook.com/help/325807937506242> or log on to you Facebook account and access your settings. To understand more about Facebook advertising please see <https://www.facebook.com/about/ads>.

These third party service providers make use of cookies to implement their services.

## **10. International transfers of information we collect**

Auka operates internationally. We collect information globally and primarily store that information in the EU. We may transfer, process and store your information outside of your country of residence, to wherever we, or our third-party service providers operate for the purpose of providing you the Services. Whenever we transfer your information, we take steps to protect it. We are fully compliant with the EU regulations.

## **11. Notice to End Users**

Our Service and other Services are intended for both personal use and use by commercial entities. Where the Service is made available to you through a provider (e.g. your bank), that provider is the administrator of the Service and is responsible for the end-users and/or service sites over which it has control. If this is the case, please direct your data privacy questions to your provider, as your use of the Service is subject to that provider's policies. We are not responsible for the privacy or security practices of an administrator's provider, which may be different than this policy.

## **12. Changes to our privacy policy**

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice by adding a notice on the Service homepages, login screens, or by sending you an email notification. We will also keep prior versions of this privacy policy in an archive for your review. We encourage you to review our privacy policy whenever you use the Services to stay informed about our information practices and the ways you can help protect your privacy.

If you disagree with any changes to this privacy policy, you will need to stop using the Service or other Services and deactivate your account(s), as outlined above.

## **13. Complain to local data protection authority**

If you have any questions or concerns regarding our notice or if you believe our notice or applicable laws relating to the protection of your personal information have not been respected, you can file a complaint with our Privacy Department listed below and we will respond to let you know who will be handling your matter and when you can expect a further response. We can request additional details



from you regarding your concerns and may need to engage or consult with other parties in order to investigate and address your issue. We will keep records of your request and any resolution.

If your request or concern is not satisfactorily resolved by us, you can approach your local data protection authority:

- see [http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

#### **14. Contact Us**

Your information is controlled by Auka AS. If you have questions or concerns about how your information is handled, please direct your inquiry to Auka, as set forth below.

##### **Auka AS**

Privacy Department  
Tordenskiolds gate 8-10  
0160 Oslo  
Norway

**e-mail:** [privacy@auka.io](mailto:privacy@auka.io)

