

## 1. Our Commitment:

RAUVA has prepared this Privacy Policy to demonstrate its commitment to safeguarding your personal data and privacy. This statement outlines how RAUVA collects, uses, and protects your personal information, and reflects our dedication to transparency and responsibility in data processing practices. This Privacy Policy applies to all personal data collected by RAUVA and aims to ensure the security of your personal data and privacy, and provide appropriate mechanisms for the exercise of your rights.

RAUVA aims to comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, commonly known as the General Data Protection Regulation ("GDPR"), as well as all other applicable legislation, including national laws that supplement the GDPR - specially, Law no. 58/2019 of 8 August. In addition, RAUVA adheres to the confidentiality obligations established under the General Regime for Credit Institutions and Financial Companies (Regime Geral das Instituições de Crédito e Sociedades Financeiras - RGICSF), as approved by Decree-Law no. 298/92 of 31 December 1992, as amended.

RAUVA (hereinafter "**We**", "**Our**", "**Ours**", "**Us**") has procedures based on personal data protection policies that are established in accordance with the GDPR as above mentioned, 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 RAUVA to transmit the legally mandatory information in its capacity as Controller (as defined under the Portuguese General Data Protection Regulation) of the personal data collected about you as User of the RAUVA App and/or RAUVA Website.

## 2. 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, the following definitions apply:

- 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 and its Services and benefits from those services directly or as a legal representative of their 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.

### 3. Who Is The Controller of Your Personal Data?

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

RAUVA has appointed a Data Protection Officer ("DPO") who is responsible for: (i) monitoring the compliance of data processing activities with applicable data protection laws and regulations, (ii) serving as a point of contact for any inquiries related to the data processing, (iii) cooperating with the Portuguese Data Protection Authority (Comissão Nacional de Proteção de Dados – "CNPD") in its role as the supervisory authority, and (iv) providing guidance and advice to RAUVA and its processors regarding their obligations concerning privacy and personal data protection..

The contact details of our Data Protection Officer are:

- **Name:** RAUVA TECHNOLOGY, UNIPessoal LDA.
- **Address:** Avenida Duque de Loulé, n.º 12, 1050-090 Lisboa
- **Email address:** privacy@rauva.com

### 4. Which Categories of Data We Collect About You?

Personal data refers to any information, regardless of its nature or format, that can directly or indirectly identify an individual, or that can be associated with them ("Personal Data").

RAUVA collects Personal Data in accordance with applicable data protection legislation.

#### Browsing RAUVA's Website:

We process cookies solely in accordance with the preferences you have set through our Cookie Settings panel and pursuant to our Cookies' Policy, available at <https://rauva.com/cookies-policy>. In particular, and only where you have provided your explicit consent, we may process data related to your location.

We maintain a record of your consent choices in line with Article 7 of the GDPR. You may review or update these preferences at any time through our Cookie Settings panel.

If you use our online application forms, we may collect and process the following data from you:

- Identification data (first name and last name)
- Contact data (email and phone number)
- Nationality
- Residence data
- Taxpayer data (NIF)

If you use our online live-chat, we will process the following data:

- Identification data (first name and last name)
- Contact data (email and phone number)

We may also process the personal data you decide to share with us via the chat. Please note, however, that Rauva does not intend to process any sensitive data through the chat, including, but not limited to, special categories of data as defined under Articles 9 and 10 of the GDPR. We strongly discourage the use of the chat for sharing any sensitive data or information.

Using RAUVA's App:

If you download RAUVA App, we will collect and process the following Personal Data:

- 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 and its Services, we may process, in addition to the above data, following Personal Data:

- 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 other associated individuals (“**Third-parties’ Personal Data**”) in order to provide our services to you and your organization. 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.

## 5. For Which Purposes Do We Process Personal Data?

By submitting data in the online application forms, the User is expressing an intention to engage the services provided by RAUVA. Accordingly, RAUVA processes Users’ personal data to take steps, at the request of the User, prior to contracting Rauva to check the User’s and their company’s eligibility for the Services.

By subscribing to the Terms and Conditions of Use of RAUVA and its Services, the User is entering into an agreement with RAUVA as a Client. RAUVA therefore processes Users’ 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 access to either the application's results or to any of RAUVA's 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, updates, new features and service offerings;
- 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 consent 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 Policy.

#### *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;
- Processing your personal data in the live-chat to reply to any request or query you may have.

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.

## **6. With Whom Will We Share Your Personal Data?**

While providing its 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 Policy

Some examples of categories of recipients of your data by RAUVA are:

<b>Affiliates</b>	Other companies belonging to Rauva's group of companies.
<b>Commercial partners</b>	Independent companies and individuals engaged by Rauva to provide you with any services you select. For example: accounting partners, banking services, law firms and others. Commercial partners are usually independent controllers of your personal data and therefore you should check their privacy notices before accepting their services.
<b>Service providers</b>	Companies that are engaged by Rauva to provide any tasks or services on behalf of Rauva. For example: IT providers, accounting providers, legal assistance. RAUVA ensures at all times that its suppliers adopt appropriate technical and organisational measures, in line with applicable data protection laws and regulation, to protect your personal data.
<b>Supervisory authorities and courts</b>	We may be requested by a competent supervisory authority or court to disclose your information.
<b>Other parties in the scope of a corporate transaction</b>	We may disclose your information to a third party in the context of a merger or transfer, acquisition or sale. 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's services.

## 7. Where Do We Process Your Personal Data?

Wherever 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 for any non-whitelisted country, RAUVA will assess the legal environment of the recipient country to implement supplementary safeguards as needed, namely those of the EC Standard Contractual Clauses (2021/914) as timely approved by the European Commission.

## 8. 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, to enable RAUVA to provide its services or to exercise its legal defense rights.

We will retain personal data only for as long as necessary to fulfil the purposes for which it was collected, or to comply with legal, accounting, or regulatory requirements. Where data is no longer needed, we will securely delete or anonymise it.

Specifically, if a User does not access the Services for a continuous period exceeding twelve (12) months, RAUVA reserves the right to delete the User's personal data, unless such data is deemed necessary for the exercise or defence of RAUVA's legal rights or to comply with other legal obligations.

For further information regarding the storage periods of your data with RAUVA, please contact us through any of the contact details in 2 above.

## 9. What Are Your Rights As A Data Subject?

### *Right of access*

Without prejudice to the protection of third-party rights, you have the right to request RAUVA for access to your personal data and to obtain information about the conditions under which it is processed.

### *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 withdrawal of consent*

You have the right to withdraw the consent you have given for data processing activities based on that consent.

### *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 have the right to request the erasure of your personal data held by RAUVA, provided that no valid grounds exist for its retention (e.g., compliance with a legal obligation, or the defence of RAUVA or third parties in legal proceedings). Note, however, that such erasure may not be immediate where RAUVA wishes to safeguard any of its rights of defense. RAUVA 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 based 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.

*Right to not be subject to automated decisions*

The use of the online application forms and its output shall not qualify as an automated decision as per the Regulation.

No decisions that produce legal or similarly significant effects are made solely by automated means. Where scoring or eligibility models are used, they are subject to human oversight.

You are always granted the right to request to RAUVA a manual assessment or reassessment of qualification criteria.

*Right to lodge a complaint with the CNPD*

You have the right to lodge complaints with the Portuguese Data Protection Authority (Comissão Nacional de Proteção de Dados – “CNPD”) concerning matters related to the exercise of your rights and the protection of their personal data. For more information, please visit [www.cnpd.pt](http://www.cnpd.pt).

## **10. How Can You Exercise Your Rights?**

You may exercise your data protection rights by sending a letter or email to the contact details of RAUVA or its Data Protection Officer using the contacts from Section 2 above.

RAUVA will respond to requests within a maximum period of 30 days, except in the case of particularly complex requests. In such cases, RAUVA will inform data subjects (i) of the need to extend the response period by a further maximum of 60 days, and (ii) of the justification for the extension.

If RAUVA considers that it is not possible to fulfil the request, the data subjects will be informed of the reasons within the timeframes outlined above.

The exercise of rights is free of charge, except in cases deemed excessive, unfounded, and/or made in bad faith. In such situations, RAUVA will inform data subjects in advance of any applicable fees and the justification for charging them.

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