

## **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 86-90 Paul Street, London, EC2A 4NE (referred to as **we, us or our**).

We are committed to maintaining the trust and confidence of our clients, our partners, visitors to our website and consumers whose personal data we might process. We want to ensure you understand how and why we might collect and use your personal data and the rights you have to control what we may do with it.

Through the advertising services we provide, we purchase digital advertising on third-party websites and apps on behalf of our clients typically via ad exchanges. To ensure that our client's adverts reach people that are likely to be interested in them, we use data about the advertising opportunity itself and about the users of our client's websites and apps to determine how likely someone is to be interested in a particular advert. As detailed below, you have choices with respect to whether to allow targeted advertising on the devices and browsers you use. We are members of IAB UK, the industry body for digital advertising in the UK. We also participate in the IAB Europe Transparency & Consent Framework and comply with its Specifications and Policies. Our identification number within the framework is 495.

This privacy policy applies where we are a controller of personal data and aims to give you information on how we collect and process personal data via your use of our services, including such personal data as you may provide to us through use of our websites or when you interact with us.

Where we act as a data processor, we rely upon our clients and partners to ensure that the data passed to us has been lawfully obtained, and that people have been properly informed as to how their personal data will be processed. Accordingly, our clients and partners are responsible for complying with their data protection obligations as a data controller.

### **1. WHAT TYPES OF PERSONAL DATA WE PROCESS**

#### **Personally Identifiable Information**

Some of the personal data we collect about you is directly identifiable, for example your name or the email address used to register as a client or when we correspond with you.

#### **Indirectly Identifiable Personal Information**

The other type of personal data we collect might not be able to directly identify you, but it could still be possible if it were associated with other pieces of information. Examples of indirectly identifiable personal information are cookies and IP addresses. A cookie is a small text file which is stored in your browser and is used to help you navigate and interact with a website and its pages. An IP (Internet Protocol) address is an identifier of your computer when it connects to the web.

Whether it is directly identifiable or not, we treat your personal data in exactly the same way, and will only ever use it for the specific purpose for which it has been provided.

## **2. PERSONAL DATA WE COLLECT AND STORE ABOUT OUR CLIENTS AND WEBSITE USERS**

There are various ways we could collect and store your personal information:

- information provided by you when you register as a client or correspond with us such as name, address or email address
- financial information such as bank account details when you invoice us
- through online identifiers such as cookies or your IP address when you visit and browse our website
- device information such as your browser or operating system when you use our services or website
- usage data based on how you use and interact with our services or browse our website
- when we are provided your data by third parties who have your consent to pass it to us
- through publicly available sources, such as personal data which you have shared via a public platform e.g. a Facebook page

This list is not exhaustive, and in specific instances we may collect additional data for the purposes set out in this Policy.

## **3. PERSONAL DATA WE COLLECT AND STORE ABOUT CONSUMERS VIA OUR ADVERTISING SERVICES**

We do not collect or receive from our clients, our partners or other third-parties any data which directly identifies individuals (such as names, addresses, phone numbers or email addresses) to provide our advertising services. As such we do not identify someone's 'real-world' identity through our technology.

We collect and store different kinds of indirectly identifiable personal information about consumers that we receive from our clients or partners in the course of providing our advertising services. We have grouped the data we may receive as follows:

- advertising data including the size and format of the advertising space for sale and its location on the webpage
- website or app activity including the pages viewed on a client's website/app or the domain and page information of the publisher website/app selling the advertising space
- device identifiers such as cookies, IP addresses or device-specific advertising IDs
- device attributes such as the make, model, operating system and language settings of the device
- connection data including connection type e.g. Wi-Fi or 4G
- location data derived from either the network the device is connected to or GPS data from the device. This may include precise location data provided by a mobile app who is responsible for ensuring you have provided consent for this data to be passed to us
- user data including information that a publisher selling the advertising space knows about the user such as their gender, age or other segment-level information

We do not have a direct relationship with the consumers whose data we receive from our clients, our partners or other third-parties, so we rely upon them to ensure that the data that they pass 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 us.

## **4. WHAT WE PROCESS PERSONAL DATA FOR**

### **For Communication**

When you provide your personal data by contacting us, we will only use that data for the specific purpose for which it was provided.

### **For Direct Marketing**

Where you provide your consent, we will use your details to send you marketing information about Arcspire that we think will interest you. If we source your corporate email address in the public domain (such as your own company website), then we may contact you proactively with marketing information about our services. You can withdraw your consent for us to use your personal data for this purpose at any time by sending us an email, or contacting us through the details included below.

### **For Our Website to Function**

We process indirectly identifiable personal information such as cookies and IP addresses as a necessary requirement for the smooth running of our website.

### **For Analytics**

With your consent, we process indirectly identifiable personal information collected during your visits to our website in order to understand visitors to our website and how they navigate around.

**Google:** This information is passed to Google to process and report to us in a way which does not identify anyone. You can find out more about how Google uses your data and access their Privacy Policy here: <https://support.google.com/analytics/answer/6004245?hl=en-GB>

### **To Provide Advertising Services to our Clients**

Acting as a data processor, we process indirectly identifiable personal information provided by our clients and partners to deliver advertising campaigns for our clients. We process data provided by our clients and publishers of websites or apps you may have visited to enhance the accuracy and relevance of the advertising we deliver. For example, we may use data from our clients' websites to identify groups of people that our clients are interested in advertising to based on the pages that they visit. We only process personal data to the instructions of the data controller, and only for the purpose for which it was passed to us.

### **To Prevent Fraudulent Advertising**

To ensure our adverts reach the people we intend to see them, we use device attributes and IP addresses to help identify and prevent fraudulent activity.

## **5. HOW LONG WE STORE YOUR PERSONAL DATA FOR**

We will not store your personal data for any longer than is needed for the purpose you provided it. So, if you have only provided your personal data so that we can respond to a query, we will erase that data once we have done so.

If you opt in to receive marketing communications, or where it is in our legitimate interest to send you marketing communications, we will continue to store your information for as long as you do not withdraw consent or object. If there is then no other purpose for holding your data, it will be deleted.

## 6. HOW TO ACCESS AND CONTROL YOUR PERSONAL DATA

You have the following rights surrounding access and control of your personal data:

- the right to ask for a copy of personal data that we hold about you
- the right to request that we delete personal data held about you
- the right to ask us to update or correct any out-of-date or incorrect personal data that we hold about you
- the right to opt out of any marketing communications that we may send you, and to object to us holding your personal data if we have no legitimate reasons to do so

Where we are provided data that is not directly identifying and that was not originally collected by Arcspire, we may not be able to stop processing or erase your data, even if you request us to. This is because we may be unable to re-identify you through only the data that we hold, and we will not seek to collect other personal data just in order to do so.

If you wish to exercise any of the above rights, please contact us using the details set out below.

### Disabling Cookies

You can prevent the setting of cookies by adjusting the settings of your browser. You can opt out of processing of such data by erasing cookies stored on your device and refusing consent to store cookies in the future. Below is a link that provides further information on cookies and how you can control their use depending on your device and the way in which you access the internet:

<https://ico.org.uk/your-data-matters/online/cookies/>

Be aware that disabling cookies may affect the functionality of the Arcspire website and others that you visit. If you are not sure whether you need them or not, it is recommended that cookies are not disabled in case they are essential to provide a service that you use.

### Limit Ad Tracking On Mobile Devices

To restrict the use of advertising identifiers on your mobile device being used to personalise the adverts you see please follow the instructions below:

For iOS users: <https://support.apple.com/en-us/HT202074>

For Android users: <https://support.google.com/ads/answer/2662922?hl=en>

## 7. KEEPING YOUR PERSONAL DATA SECURE

We apply technical and administrative security measures to protect the data we collect against accidental or unlawful destruction and loss, alteration, unauthorised disclosure or access, in particular where the processing involves the transmission of data over a network, and against other unlawful forms of processing.

## 8. DISCLOSURES OF YOUR PERSONAL DATA

We will not pass your personal data to anyone else without first obtaining your consent, unless there is some circumstance by which we are required to do so by law.

## **9. MAKING A COMPLAINT**

If you feel that your personal data has not been handled correctly by us, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them by calling 0303 123 1113 or visit <https://ico.org.uk/make-a-complaint/>.

## **10. UPDATES TO OUR PRIVACY POLICY**

We may make changes to this Privacy Policy from time to time, so encourage you to check these pages periodically. This Privacy Policy was last updated on 31<sup>st</sup> July 2025.

## **11. HOW TO CONTACT US**

We hope this Privacy Notice has been helpful in explaining how we handle your personal data and your rights to control it. If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

### **Write to Us**

Arcspire Limited  
86-90 Paul Street  
London  
EC2A 4NE

### **Email Us**

team@arcspire.io