

# ARCARIUS CAPITAL S.A. — Privacy Policy

Effective: July 30, 2025

## 1. Summary

This Privacy Policy explains how we collect, use, disclose, and protect personal data when you use the website at [arcariuscapital.ch](https://arcariuscapital.ch) (the “Site”). We operate the Site and act as the data controller for personal data processed through the Site.

## 2. What we collect

2.1 Information you provide directly: When you submit our contact form, we collect the following fields: first name, last name, email address, optional phone number, optional business name, and the message you write.

2.2 Automatic data: When you visit the Site, we may collect standard log and device information, such as IP address, browser type, operating system, referral URL, pages viewed, and timestamps. We use cookies and similar technologies; see “Cookies & Analytics”.

## 3. Purposes and legal bases

We process personal data to:

- (a) respond to and manage inquiries you send through the contact form (GDPR legal bases: Article 6(1)(b) performance of a contract or Article 6(1)(f) our legitimate interests in operating the Site and communicating with you);
- (b) operate, secure, and improve the Site, including detecting abuse (Article 6(1)(f) legitimate interests);
- (c) comply with legal obligations (Article 6(1)(c)).

We do not use inquiry details for marketing or newsletters unless you separately request this.

## 4. Data retention

We keep inquiry information for as long as needed for the purpose for which it was collected and as required by applicable law. When retention is no longer necessary, we delete or anonymize the data.

## 5. Where data are processed; international transfers

The Site is hosted and personal data are stored in Canada. Where applicable, we rely on adequacy decisions and appropriate safeguards for international transfers, including Canada’s adequacy status for commercial organizations under PIPEDA. When required, we use Standard Contractual Clauses or equivalent safeguards with our service providers and take supplementary measures as appropriate.

## 6. Disclosures to service providers

We disclose personal data to trusted vendors that help us operate the Site, subject to contracts that limit their use of the data to providing services to us. These include hosting, security, analytics, and form processing providers.

## 7. Cookies & Analytics

7.1 Consent management: In EU/UK/Switzerland, we use a cookie banner that lets you accept, reject, or customize non essential cookies. You can change your preferences at any time through the banner’s “Settings.”

7.2 Google Analytics 4: We use GA4 to understand Site usage (page views, user flows, device stats). Where required, GA4 only runs after consent. We configure GA4 to avoid using data for advertising features. For details on Google’s processing, see Google’s privacy documentation.

7.3 reCAPTCHA: Our contact form uses Google reCAPTCHA to prevent abuse. reCAPTCHA may collect device and usage data to provide its service. The Google Privacy Policy and Terms of Service apply.

7.4 Embedded maps: When you interact with embedded maps, the third party provider may set functional cookies or process your IP address to deliver the map.

7.5 Necessary cookies: We use strictly necessary cookies to provide core Site functionality (e.g., security,

load balancing, consent logging). These cannot be switched off.

7.6 You can control cookies via your browser settings as well.

## 8. Your rights

Depending on your location, you may have rights to:

- access, correct, or delete your personal data;
- object to or restrict processing;
- data portability; and
- withdraw consent (where processing is based on consent).

To exercise rights, use the contact form on the Site. We will verify your request and respond as required by applicable law. If you are in the EU/EEA, UK, or Switzerland, you may also lodge a complaint with your supervisory authority.

## 9. California (CCPA/CPRA) notice

Categories collected: Identifiers (name, email, IP address), Internet or other network activity (usage data), and professional information (business name if provided).

Purposes: Responding to inquiries, operating and improving the Site, security and fraud prevention.

Retention: As described in Section 4.

“Sale”/“Share”: We do not sell or share personal information as defined by the CPRA. We disclose personal information to service providers for business purposes. We do not use or disclose sensitive personal information to infer characteristics about you. California residents may exercise the rights described in Section 8.

## 10. Security

We use administrative, technical, and physical safeguards appropriate to the nature of the data, including encryption in transit (HTTPS), access controls, and vendor due diligence. No method of transmission or storage is completely secure.

## 11. Children

The Site is not directed to children and we do not knowingly collect personal data from anyone under 16 years of age. If you believe a child has provided us personal data, please contact us and we will take appropriate steps to delete it.

## 12. Changes

We may update this Policy from time to time. The “Effective” date above indicates the latest revision. Material changes will be communicated via the Site.

## 13. Contact

To ask questions or exercise your rights, please contact us via the contact form available on the Site.

## Appendix: Cookie Overview

### Cookie Categories We Use

- A. Strictly Necessary: security, load balancing, consent logs.
- B. Analytics: Google Analytics 4, used to understand site usage in aggregate.
- C. Functional/Embedded: reCAPTCHA anti abuse and embedded maps.

You can update your preferences at any time using the cookie banner on the site.