

La Cucina Privacy Policy

Last modified: October 2021

Introduction

This Privacy Policy outlines La Cucina's ("**we**", "**our**" or "**the Company**") practices with respect to information collected from users who access La Cucina's website at <https://lacucina.finance/> (the "**Site**"), register to or uses any of the Services (as defined in our Terms of Use), or communicate with us in any other way (collectively: "**Users**").

We encourage Users to carefully read the Privacy Policy and use it to make informed decisions. The Privacy Policy should be read alongside our Terms of Use <https://lacucina.finance/terms.pdf> , including with regard to the definitions set therein.

In this Privacy Policy you can read about:

- **What type of information we collect**
- **Legal basis for processing**
- **How we receive information**
- **How we use and with whom we share the information**
- **User rights**
- **For how long we retain the information**
- **How we safeguard the information**
- **How to contact us**

What Information we collect?

We collect two types of data and information from Users who access the Services.

The first type of information is non-identifiable information pertaining to a User(s), which may be made available or gathered via your access to the Services ("**Non-personal Information**"). We are not aware of the identity of a User from which the Non-Personal Information was collected. Non-personal Information which is being collected may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information (e.g. browser type, language preference, access time, etc.) which may be collected in order to enhance the functionality of the Services. We may also collect such information on your activity on the Services (e.g. clicks, actions, etc.) as required to provide them.

The second type of information is individually identifiable information, namely information that identifies an individual or which may, with reasonable effort, identify an individual ("**Personal Information**"). Such information includes:

- **Contact and La Cucina account information:** When you register to the Services or contact us for any other purpose, you will be asked to provide us with your full name, email address, phone number, and virtual asset wallet address.
- **Device Information:** We may also collect pseudonymized (which cannot directly identify you) Personal Information from your device. Such information includes geolocation data, IP address, unique identifiers (e.g. MAC address and UUID) and other information which relates to your activity through the Services.

- Voluntary information which is collected from time to time (for example, through surveys) to enable us to improve our services or consider the wider needs of our users or potential users, or voluntary information that might be collected from you upon request and subject to your specific consent, for the purpose of provision of any of the Services to you.

If we associate Non-Personal Information with Personal Information, we will treat such information as Personal Information.

Information from Other Sources

We are working closely with third parties (including, for example, our business partners, sub-contractors, etc.) and may receive information about you from them to the extent permitted by applicable laws. For example, we may receive your data from third party providers who help us with the provision and maintenance of our Services, traffic analytics vendors, fraud prevention agencies and others. In particular, virtual asset wallets and their providers may provide us with your virtual asset wallet address and certain other information you choose to share with virtual asset wallets or their providers. We may combine this information with the information we have already collected from you via the Service in order to provide you with, and to and improve, our Service.

Why We Process Your Personal Information, and under What Legal Bases?

This section explains for what purposes we use your Personal Information and outlines the legal bases that underlie our usage.

Purpose	Legal Basis
Provision of our Services; support. We use your Personal Information, such as, inter alia, your name, mobile number, email address, virtual asset wallet address, for consumer services purposes. This includes, for example, responding to your inquiries and verifying your identity.	The legal bases for processing this data are the performance of our contractual towards you; your consent (for example, when you provide Personal Information); compliance with our legal obligations; and our legitimate interests. Our legitimate interests in this case are enforcing our policies, protection against fraud and misuse of our Services.
Improve our Services. We collect and analyse information about you and your usage of our Services to improve the usability and effectiveness of our Services.	The legal bases for processing this data are our legitimate interests, in this case – providing and improving our Services.
Compliance with applicable laws.	We may be required to collect, retain, or share your Personal Information, under applicable laws.

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We may use the information for the following:

- Communicating with you – If you have contacted us, for any reason, we will use your information in order to further communicate with you.
- Conducting statistical and analytical purposes, intended to improve the Services. Providing you with the Services.
- Providing the Services.
- Ensuring compliance with our terms, policies and applicable laws.

With Whom do We Share the Information?

In addition to the different uses listed above, we may transfer or disclose Personal Information to our subsidiaries, affiliated companies, virtual asset wallets or their providers, and subcontractors. In addition to the purposes listed in this Privacy Policy, we may share Personal Information with our trusted third party providers, who may be located in different jurisdictions across the world, for any of the following purposes:

- Providing you with the Services, including providing a personalized display of our Site;
- Storing and processing such information on our behalf;
- Performing research, technical diagnostics or analytics;
- Identification and verification purposes;

We may also disclose information if we have good faith to believe that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable laws, legal process or governmental request; (ii) enforce our policies, including investigations of potential violations thereof; (iii) investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues; (iv) to establish or exercise our rights to defend against legal claims; (v) prevent harm to the rights, property or safety of us, our users, yourself or any third party; or (vi) for the purpose of collaborating with law enforcement agencies or in case we find it necessary in order to enforce intellectual property or other legal rights.

In any case we will conclude that disclosure of Personal Information is necessary, we will only disclose that portion of the Personal Information that is required in order to satisfy the basis for disclosure. We will share the Personal Information under appropriate safeguards.

User Rights

This section addresses the specific rights applying to residents of the EU or residents of other jurisdictions that grant the below rights.

Depending on your jurisdiction, you may request to:

- a. Receive confirmation as to whether or not personal information concerning you is being processed, and access your stored personal information, together with supplementary information.

- b. Receive a copy of personal information you directly volunteer to us in a structured, commonly used and machine-readable format.
- c. Request rectification of your personal information that is in our control.
- d. Request erasure of your personal information.
- e. Object to the processing of personal information by us.
- f. Request to restrict processing of your personal information by us.
- g. Lodge a complaint with a supervisory authority.

However, please note that these rights are not absolute, and may be subject to our own legitimate interests and regulatory requirements under applicable laws.

If you wish to exercise any of the aforementioned rights, or receive more information, please contact us at support@lacucina.finance.

We will make an effort to reply within a reasonable timeframe. Please feel free to reach out to us at any time. If you are unsatisfied with our response, you can lodge a complaint with the applicable data protection supervisory authority.

Retention

We will retain your personal information for as long as necessary to provide the Services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. We may keep records containing user Personal Information, account opening documents, communications and anything else, if and as, required by applicable laws.

Third party collection of information

Our policy only addresses the use and disclosure of information we collect from you. To the extent you disclose your information to other parties or sites throughout the internet (including through our Site), different rules may apply to their use of the information you disclose to them, as determined by such third parties and applicable laws governing their processing. Accordingly, we encourage you to read the terms and conditions and privacy policy of each third party that you choose to disclose information to.

This Privacy Policy does not apply to the practices of companies including but not limited to those of virtual asset wallets or their providers that we do not own or control, or to individuals whom we do not employ or manage, including any of the third parties which we may disclose information as set forth in this Privacy Policy.

How do we safeguard your information?

We take great care in implementing and maintaining the security of the Site and your information. We employ industry standard procedures and policies to ensure the safety of the information we collect and retain, and prevent unauthorized use of any such information, and we require any third party to comply with similar security requirements, in accordance with this Privacy Policy. Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorized access or abuse the Services, and we make no warranty, express, implied or otherwise, that we will prevent such access.

Transfer of data outside the European Economic Area ("EEA")

Please note that some data recipients may be located outside the EEA. In such cases we will transfer your data only to such countries as approved by the European Commission as providing adequate level of data protection, or enter into legal agreements ensuring an adequate level of data protection.

Cookies and Tracking Technologies

When you visit or access our Site we use (and authorize 3rd parties to use) pixels, cookies, events and other technologies (collectively, "**Tracking Technologies**"). Those allow us to automatically collect information about you, your device and your online behavior, in order to enhance your navigation in our Site, improve our Site's performance, perform analytics and customize your experience. In addition, we may merge data we have with data collected through these tracking technologies and data we may obtain from other sources and, as a result, such data may become Personal Information.

We also use a tool called "Google Analytics" to collect information about your use of the Site. Google Analytics collects information such as how often users access the Site, what pages they visit when they do so, etc. We use the information we get from Google Analytics only to improve our Site and services. Google Analytics collects the IP address assigned to you on the date you visit Site, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to the Site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy.

How to manage your cookie settings - there are various ways in which you can manage and control your cookie settings. Please remember that, by deleting or blocking cookies, some of the features of the Services may not work properly or as effectively:

- [Google Chrome](#)
- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Safari \(Desktop\)](#)
- [Safari \(Mobile\)](#)
- [Android Browser](#)

For other browsers, please consult the documentation that your browser manufacturer provides.

Turning off third party cookies - you can turn off certain third party targeting and advertising cookies by visiting the [Network Advertising Initiative opt-out webpage](#).

Other helpful resources - to learn more about advertisers' use of cookies the following links may be helpful:

- [European Interactive Digital Advertising Alliance \(EU\)](#)
- [Internet Advertising Bureau \(US\)](#)
- [Internet Advertising Bureau \(EU\)](#)

Corporate transaction

We may share information in the event of a corporate transaction (e.g. sale of a part or the whole of our business, or a merger, consolidation or asset sale). In the event of the above, the transferee or acquiring company will assume the rights and obligations as described in this Privacy Policy.

Minors

The Services are intended to the use of individuals over the age of majority in the territory they reside in and in the territory of their citizenship, and in any case is not intended to the use of individuals under the age of 18 ("**age of majority**"). In the event that we become aware that a user under the age of majority has shared any information, we will discard such information. If you have any reason to believe that an individual under the age of majority has shared any information with us, please contact us at: support@lacucina.finance.

Exercising Your Rights

You can exercise your rights by submitting a verifiable consumer request to our physical address or to our email address, as specified below in the "How to contact us" section. Only you or a person authorized to act on your behalf may make a consumer request related to your Personal Information.

The request must:

- Provide sufficient information to allow us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient details to allow us to properly understand, evaluate, and respond to it.
- We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

You may only request a copy of your data twice within a 12-month period.

If you have any general questions about the Personal Information that we collect about you how we

use it, please contact us at support@lacucina.finance.

Response Timing and Format

Our goal is to respond to a verifiable consumer request within 45 days of its receipt. If we require more time, we will inform you of the reason and extension period in writing within the first 45 days period. We will deliver our written response, by mail or electronically, at your option. Any disclosures we provide will cover only the 12-month period preceding the request. If reasonably possible, we will provide your Personal Information in a format that is readily useable and should allow you to transmit the information without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

In case of rejection, the response we provide will explain the reasons for which we cannot comply with your request.

Please note that these CCPA rights are not absolute and requests are subject to any applicable legal requirements, including legal and ethical reporting or document retention obligations.

Designating Agents

You can designate an authorized agent to make a request under the CCPA on your behalf if:

- The authorized agent is a natural person or a business entity registered with the Secretary of State of California; and
- You sign a written declaration that you authorize the authorized agent to act on your behalf.

If you use an authorized agent to submit a request to exercise your right to know or your right to request deletion, please mail a certified copy of your written declaration authorizing the authorized agent to act on your behalf using the contact information below.

If you provide an authorized agent with power of attorney pursuant to Probate Code sections 4000 to 4465, it may not be necessary to perform these steps and we will respond to any request from such authorized agent in accordance with the CCPA.

Non-Discrimination

Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Updates or amendments to this Privacy Policy

We reserve the right to periodically amend or revise the Privacy Policy; material changes will be effective immediately upon the display of the revised Privacy policy. The last revision will be reflected in the "Last modified" section. Your continued use of the Services, following the notification of such amendments on our Site, constitutes your acknowledgment and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.

Controlling version

This Privacy Policy has been drafted in the English language, which is the original and controlling version of this Privacy Policy. To the extent translated, all translations of this Privacy Policy into other languages shall be solely for convenience and shall not control the meaning or application of this Privacy Policy. In the event of any discrepancy between the meanings of any translated versions of the Privacy Policy and the English language version, the meaning of the English language version shall prevail.

How to contact us

If you have any questions about the Services or the information we collect about you and how we use it, you can contact us at support@lacucina.finance .

Our physical address is: 116 Gladstonos, M.K. Kyprianou House, 3032, Limassol, Cyprus