

# Privacy Policy of Wealthica

Wealthica collects some Personal Data from its Users.

## Owner and Data Controller

Data Protection Officer (DPO)  
Wealthica Financial Technology Inc.  
1100 Boulevard René-Lévesque O, 25th Floor  
Montréal, QC H3B 5C9

**Owner contact email:** [security@wealthica.com](mailto:security@wealthica.com)

## Types of Data collected

Among the types of Personal Data that Wealthica collects, by itself or through third parties, there are: Cookies; Usage Data; email address; first name; last name; various types of Data; Data communicated while using the service; username; password; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); geographic position; language.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using Wealthica. Unless specified otherwise, all Data requested by Wealthica is mandatory and failure to provide this Data may make it impossible for Wealthica to provide its services. In cases where Wealthica specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by Wealthica or by the owners of third-party services used by Wealthica serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published or shared through Wealthica.

## Mode and place of processing the Data

### Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of Wealthica (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

### Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

### Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

## The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Analytics, Contacting the User, Displaying content from external platforms, Content performance and features testing (A/B testing), Hosting and backend infrastructure, Remarketing and behavioral targeting, Social features, Advertising, Managing contacts and sending messages, Handling payments, Access to third-party accounts, Location processing, Tag Management, Content commenting, Registration and authentication and Handling activities related to productivity.

For specific information about the Personal Data used for each purpose, the User may refer to the section “Detailed information on the processing of Personal Data”.

## **Detailed information on the processing of Personal Data**

Personal Data is collected for the following purposes and using the following services:

### **Access to third-party accounts**

This type of service allows Wealthica to access Data from your account on a third-party service and perform actions with it. These services are not activated automatically, but require explicit authorization by the User.

#### **Google Drive account access**

This service allows Wealthica to connect with the User's account on Google Drive, provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

### **Advertising**

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on Wealthica, possibly based on User interests.

This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers for identifying Users, behavioral retargeting i.e. displaying ads tailored to the User's interests and behavior, or to measure ads performance. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

#### **Google Ads conversion tracking**

Google Ads conversion tracking is an analytics service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Google Ads advertising network with actions performed on Wealthica.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

#### **Meta ads conversion tracking (Meta pixel) (Meta Platforms, Inc.)**

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms, Inc. that connects data from the Meta Audience Network with actions performed on Wealthica. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

### **Analytics**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

## **Google Analytics**

Google Analytics is a web analysis service provided by Google Inc. (“Google”). Google utilizes the Data collected to track and examine the use of Wealthica, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#) – [Opt Out](#).

## **MixPanel (MixPanel)**

MixPanel is an analytics service provided by Mixpanel Inc.

Personal Data processed: Cookies; Usage Data.

Place of processing: US – [Privacy Policy](#) – [Opt Out](#).

## **Meta Events Manager (Meta Platforms Ireland Limited)**

Meta Events Manager is an analytics service provided by Meta Platforms Ireland Limited. By integrating the Meta pixel, Meta Events Manager can give the Owner insights into the traffic and interactions on Wealthica.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – [Privacy Policy](#).

## **Contacting the User**

### **Mailing List or Newsletter (Wealthica)**

By registering on the mailing list or for the newsletter, the User’s email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning Wealthica. Your email address might also be added to this list as a result of signing up to Wealthica or after making a purchase.

Personal Data processed: email address; first name; last name.

### **Contact form (Wealthica)**

By filling in the contact form with their Data, the User authorizes Wealthica to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form’s header.

Personal Data processed: email address; first name; last name.

## **Content commenting**

Content commenting services allow Users to make and publish their comments on the contents of Wealthica.

Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments.

If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when Users do not use the content commenting service.

### **Disqus with advertising enabled (Disqus)**

Disqus with advertising enabled is a hosted discussion board solution provided by Disqus that enables Wealthica to add a commenting feature to any content. Disqus and its third-party partners use Trackers in order to serve Users personalized ads. Users can opt out of such use of Trackers by visiting this [opt-out page](#).

Personal Data processed: Data communicated while using the service; Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

## **Content performance and features testing (A/B testing)**

The services contained in this section allow the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of Wealthica.

### **Google Optimize**

Google Optimize is an A/B testing service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google").

Google may use Personal Data to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#); Ireland – [Privacy Policy](#).

### **Displaying content from external platforms**

This type of services allows you to view content hosted on external platforms directly from the pages of Wealthica and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

### **Gravatar (Automattic Inc.)**

Gravatar is an image visualization service provided by Automattic Inc. that allows Wealthica to incorporate content of this kind on its pages.

Please note that if Gravatar images are used for comment forms, the commenter's email address or parts of it may be sent to Gravatar - even if the commenter has not signed up for that service.

Personal Data processed: email address; Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **Wistia widget (Wistia, Inc.)**

Wistia is a video content visualization service provided by Wistia, Inc. that allows Wealthica to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **Google Fonts (Google LLC)**

Google Fonts is a typeface visualization service provided by Google LLC that allows Wealthica to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **YouTube video widget (Google LLC)**

YouTube is a video content visualization service provided by Google LLC that allows Wealthica to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **Font Awesome (Fonticons, Inc. )**

Font Awesome is a typeface visualization service provided by Fonticons, Inc. that allows Wealthica to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

## Handling activities related to productivity

This type of service helps the Owner to manage tasks, collaboration and, in general, activities related to productivity. In using this type of service, Data of Users will be processed and may be retained, depending on the purpose of the activity in question. These services may be integrated with a wide range of third-party services disclosed within this privacy policy to enable the Owner to import or export Data needed for the relative activity.

### Google Workspace (Google LLC)

Google Workspace is an integrated suite of cloud-based productivity, collaboration and storage services provided by Google LLC. Gmail or other G Suite services are not scanned by Google for advertising purposes. In addition, Google does not collect or use data inside these services for advertising purposes in any other way.

Personal Data processed: Usage Data.

Place of processing: United States – [Privacy Policy](#).

## Handling payments

Unless otherwise specified, Wealthica processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. Wealthica isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

### Recurly (Recurly, Inc.)

Recurly is a payment service provided by Recurly, Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

### Stripe (Stripe Inc)

Stripe is a payment service provided by Stripe Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

## Hosting and backend infrastructure

This type of services has the purpose of hosting data and files that enable Wealthica to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of Wealthica. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

### Amazon Web Services (AWS) (Amazon Web Services, Inc.)

Amazon Web Services (AWS) is a hosting and backend service provided by Amazon Web Services, Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#); Canada – [Privacy Policy](#).

### MongoDB Cloud (MongoDB, Inc.)

MongoDB Cloud is a hosting and backend service provided by MongoDB, Inc.

Personal Data processed: Usage Data.

Place of processing: United States – [Privacy Policy](#).

### Bright Data

Infrastructure for proxy servers.

## **DigitalOcean (DigitalOcean Inc.)**

DigitalOcean is a hosting service provided by DigitalOcean Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Canada – [Privacy Policy](#).

## **Location processing**

### **MaxMind**

MaxMind is an IP geolocation and online fraud prevention service.

Personal Data processed: IP address

## **Managing contacts and sending messages**

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

### **Sendgrid (Sendgrid)**

Sendgrid is an email address management and message sending service provided by Sendgrid Inc.

Personal Data processed: email address.

Place of processing: US – [Privacy Policy](#).

### **OneSignal (Lilomi, Inc.)**

OneSignal is a message sending service provided by Lilomi, Inc.

OneSignal allows the Owner to send messages and notifications to Users across platforms such as Android, iOS, and the web. Messages can be sent to single devices, groups of devices, or specific topics or User segments. Depending on the permissions granted to Wealthica, the Data collected may also include precise location (i.e. GPS-level data) or WiFi information, apps installed and enabled on the User's device. Wealthica uses identifiers for mobile devices (including Android Advertising ID or Advertising Identifier for iOS, respectively) and technologies similar to cookies to run the OneSignal service.

**The Data collected may be used by the service provider for interest-based advertising, analytics and market research. In order to understand OneSignal's use of Data, consult [OneSignal's privacy policy](#).**

### **Push notifications opt-out**

Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then changing those settings for some or all of the apps on the particular device.

### **Interest-based advertising opt-out**

Users may opt-out of OneSignal advertising features through applicable device settings, such as the device advertising settings for mobile phones. Different device configurations, or updates to devices, may affect or change how these indicated settings work.

Personal Data processed: email address; geographic position; language; Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

## **Registration and authentication**

By registering or authenticating, Users allow Wealthica to identify them and give them access to dedicated services.

Depending on what is described below, third parties may provide registration and authentication services. In this case, Wealthica will be able to access some Data, stored by these third-party services, for registration or identification purposes.

Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

### **Plaid Auth (Plaid Inc.,)**

Plaid Auth is a registration and authentication service provided by Plaid Inc..

Plaid Auth retrieves the accounts and routing numbers of Users who have linked their account via their banking credentials

Personal Data processed: email address; password; username.

Place of processing: United States – [Privacy Policy](#).

### **Investnet (Yodlee)**

Yodlee provides account aggregation – consolidating information from multiple accounts, e.g. credit card, bank, investment, email, travel rewards, etc.

### **Remarketing and behavioral targeting**

This type of service allows Wealthica and its partners to inform, optimize and serve advertising based on past use of Wealthica by the User.

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioral targeting activity.

Some services offer a remarketing option based on email address lists.

In addition to any opt-out feature provided by any of the services below, Users may opt out by visiting the [Network Advertising Initiative opt-out page](#).

**Users may also opt-out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.**

### **Google Ads Remarketing**

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of Wealthica with the Google Ads advertising network and the DoubleClick Cookie.

Users can opt out of Google's use of cookies for ads personalization by visiting Google's [Ads Settings](#).

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#); Ireland – [Privacy Policy](#) – [Opt Out](#).

### **Social features**

#### **Inviting and suggesting friends (Wealthica)**

Wealthica may use the Personal Data provided to allow Users to invite their friends - for example through the address book, if access has been provided - and to suggest friends or connections inside it.

Personal Data processed: various types of Data.

### **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on Wealthica in a centralized fashion.

This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

#### **Google Tag Manager (Google LLC)**

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **Information on opting out of interest-based advertising**

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

### **Further information about the processing of Personal Data**



## Push notifications

Wealthica may send push notifications to the User.

## The Service is not directed to children under the age of 13

Users declare themselves to be adult according to their applicable legislation. Minors may use Wealthica only with the assistance of a parent or guardian. Under no circumstance persons under the age of 13 may use Wealthica.

## Selling goods and services online

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery. The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by Wealthica depends on the payment system used.

## Cookie Policy

Wealthica uses Trackers. To learn more, Users may consult the [Cookie Policy](#).

## Further Information for Users

### Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

### Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

## The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.



- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

### **Details about the right to object to processing**

**Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.**

**Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.**

### **How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

## **Additional information about Data collection and processing**

### **Legal action**

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of Wealthica or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

### **Additional information about User's Personal Data**

In addition to the information contained in this privacy policy, Wealthica may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

### **System logs and maintenance**

For operation and maintenance purposes, Wealthica and any third-party services may collect files that record interaction with Wealthica (System logs) or use other Personal Data (such as the IP Address) for this purpose.

### **Information not contained in this policy**

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

### **Changes to this privacy policy**

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within Wealthica and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at

the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

## **Definitions and legal references**

### **Personal Data (or Data)**

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

### **Usage Data**

Information collected automatically through Wealthica (or third-party services employed in Wealthica), which can include: the IP addresses or domain names of the computers utilized by the Users who use Wealthica, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

### **User**

The individual using Wealthica who, unless otherwise specified, coincides with the Data Subject.

### **Data Subject**

The natural person to whom the Personal Data refers.

### **Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

### **Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of Wealthica. The Data Controller, unless otherwise specified, is the Owner of Wealthica.

### **Wealthica (or this Application)**

The means by which the Personal Data of the User is collected and processed.

### **Service**

The service provided by Wealthica as described in the relative terms (if available) and on this site/application.

### **European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

### **Cookie**

Cookies are Trackers consisting of small sets of data stored in the User's browser.

### **Tracker**

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

## **Legal information**

This privacy policy relates solely to Wealthica, if not stated otherwise within this document.

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