

Arkanala Privacy Policy

Effective: 2024.10.24.

PLEASE READ THIS PRIVACY POLICY CAREFULLY. IT CONTAINS IMPORTANT INFORMATION ABOUT HOW WE PROCESS YOUR PERSONAL INFORMATION.

Digilic Inc., doing business as Arkanala, (“Arkanala”, “we”, “us”, and/or “our”), is a technology company offering AI-driven tarot card readings for entertainment purposes through the Arkanala platform, which includes the website www.arkanala.com, its subdomains (the “Site”), and all related service offerings (collectively, the “Services”). This privacy policy (the “Policy”) outlines how we collect, use, store, and share personal data when you use or access the Arkanala platform, the Site, or any related Services.

1. Information We Collect

As used in this Policy, “Personal Data”, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect the following types of Personal Data:

1.1. Information You Provide. We collect Personal Data that you voluntarily provide us when you register on the Services, express an interest in obtaining information about us or our Services, when you access or use the Services. The Personal Data we collect depends on the nature of your interactions with us and the Services, the choices you make, and the features you use. All personal information that you provide to use must be true, complete, and accurate, and you must notify us of any changes to such personal information. The Personal Data we may provide and we may collect may include the following:

- **Personal/Identity Data:** This includes personally identifiable information that could be used to contact or identify you. Personally identifiable information may include, but is not limited to: name, gender, email address, billing address, phone number, payment information, or other similar identifiers. Register an account on our site
- **Account Information:** Information related to your account, such as email, username, password, subscription details, purchases, tarot reading history, and purchases.
- **User Content:** Any content you provide while using the Services. Including any text prompts, inputs, contact, content, messages, provide feedback or communicate with us by online form, mail, phone or email, or that you input into the Services.
- **Marketing & Communications Information:** This includes your preferences in receiving marketing and communications from us and our third parties, contact preferences
- **Payment Information:** We may collect data necessary to process your payment if you make purchases, such as payment instrument number, and security code. All payment data is collected by third-party processor and stored by Stripe. Arkanala does not store credit card information. You may find their privacy policy notice link(s) here: <https://stripe.com/privacy>.
- **Other information you elect to send to Arkanala.** Such as your responses or information you include in communications to us.

1.2. Information We Collect Automatically

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for internal analytics and reporting purposes.

- **Usage & Log Data:** Usage Data includes information about how you use our Services, which is then aggregated, so as to anonymize that data. Information about how you interact with Arkanala, including log-in times, pages viewed, features used, and other usage metrics.
- **Device Information:** Data about the device and internet connection you use to access Services, including IP address, browser type and version, device details, operating system and platform, your login data, time zone settings, and approximate geolocation, browser plug-in types and versions, and other technology on the devices you may use to access our Services.
- **Cookies & Tracking Technologies:** Information collected through cookies and similar tracking technologies to understand user preferences, enhance user experience, and provide analytics.

1.3. Aggregated Data

We may collect, use and share aggregated data (e.g. statistical or demographic data) for any purpose. The data may be derived from your Personal Data but is not considered Personal Data because it does not identify you personally.

1.4. Reading Data

When you use our Services, you may provide Personal Data along with other information to facilitate tarot card readings, which when used by the Services, becomes Reading Data. Reading Data includes tarot reading scripts (text or audio), inputs you provide, prompts or partial prompts we use during Readings, and the outputs generated by processing information. Although we advise against entering Personal Data in the reading prompts, as stated in our Terms of Service, we cannot predict the nature of the data you input. If you enter Personal Data, it may be shared with third parties as part of the service delivery.

1.5. Sensitive Information.

We do not intentionally process sensitive information. However, you may choose to input sensitive data, such as religious views, health information, or philosophical beliefs. By doing so, you consent to our processing of this information as outlined in this Policy. We will not use sensitive information for marketing or advertising purposes.

2. How We Use Your Information

We will only use your Personal Data in compliance with applicable laws. The most common purposes and uses of your information are as follows:

2.1. Service Provision.

To manage your account, generate and deliver tarot readings, and process transactions. Administer, maintain and improve the Services.

2.2. Personalization.

To customize your user experiences and tailor tarot readings to your preferences. Suggest relevant content based on your inputs.

2.3. Communication.

To send updates, notifications, and information about our Services, events, and changes to your account.

2.4. Analytics and Improvements.

To analyze usage patterns, identify trends, and improve platform functionality. Enhance the performance of the Services and develop new features.

2.5. Security.

To monitor for fraudulent activity, detect malicious behavior, and protect the integrity of our systems, services, and data.

2.6. Legal Compliance.

To fulfill obligations, resolve disputes, enforce our Terms of Service, and protect our rights.

3. How We Share Your Personal Data

We may share your Personal Data in the following scenarios:

3.1. Service Providers and Vendors.

We may share your information with companies that assist us in operating the Services, such as hosting, IT support, customer service, email delivery, website analytics, and marketing. For example, your email address may be shared with marketing providers to send communications on our behalf. These providers are prohibited from using your data for any other purposes.

3.2. Professional Advisors.

We may share your information with legal, financial, banking, auditing, and other professional advisors when necessary for the services they provide to us.

3.3. Advertising Partners.

We may share certain data, such as IP addresses, page visits, and browser types, with advertising partners for interest-based and other marketing purposes. However, we do not share the content of your readings for advertising purposes.

3.4. Business Transfers.

In connection with any merger, acquisition, sale of assets, financing, or similar transactions, your Personal Data may be transferred to the acquiring entity, or other involved party. This includes cases such as during negotiations, bankruptcy or other legal proceedings.

3.5. Affiliates.

We may share your Personal Data with our affiliates, such as parent companies or subsidiaries, ensuring they comply with this Policy.

3.6. Third-Party Service Providers.

Trusted third-party providers, such as payment processors and data storage services, may access your Personal Data to assist us in delivering our Services. These providers are prohibited from using your data for any other purpose. Examples of third-party service providers include:

- The Rocket Science Group LLC (MailChimp) – USA
- OpenAI Inc. – USA
- Google LLC – USA
- Amazon Web Services Inc. – USA

3.7. Authorities and Legal Compliance.

We may disclose your Personal Data and information to law enforcement, government authorities, or private parties as required by law, or if necessary to protect our rights, privacy, safety, or property.

3.8. International Transfers.

Some of our third-party providers are located outside the U.S., meaning your data may be transferred internationally. To ensure the protection of your data, we implement one of the following safeguards:

- Transfer to countries recognized as providing an adequate level of data protection.
- Use of contracts approved for U.S. transfers, ensuring the same level of protection as within the U.S.

4. How We Secure Your Information

We are committed to safeguarding your Personal Data through the implementation of commercially reasonable and industry-standard security measures. However, no method of data transmission or storage is completely secure or error free. Therefore, we cannot guarantee the absolute security of your information.

- **Encryption:** We use encryption technologies to protect personal and sensitive data during transmission and storage.
- **Access Controls:** Access to Personal Data is limited to authorized personnel, based on their job responsibilities.
- **Security Audits:** We conduct regular audits and assessments to identify and mitigate potential vulnerabilities.
- **User Controls:** You can manage your account information and update or delete Personal Data through your account dashboard.
- **Email Caution:** Emails to or from our Services may not be fully secure. Please exercise caution when sharing sensitive information via email.
- **No Guarantee.** While we strive to protect your data, we cannot guarantee that our security measures will prevent all unauthorized access or breaches.

5. Data retention

We retain your Personal Data only as long as necessary to fulfill the purposes for which it was collected, comply with legal obligations, resolve disputes, enforce agreements, or for other legitimate business purposes. We may retain usage data for internal analysis or to improve service functionality, except where longer retention is legally required. The retention period depends on factors such as:

- The amount, nature and sensitivity of the data.
- The risk of harm from unauthorized use or disclosure.
- Legal requirements for data retention.

6. Where We Store Your Data

We take reasonable steps to ensure your data is treated securely and in accordance with this Policy, regardless of its location. Your Personal Data may be processed at our offices or by third parties in various locations, including outside the U.S., your state, province, or country,

where data protection laws may vary from those in your jurisdiction. By using our Services and providing Personal Data, you consent to this transfer.

7. Your Rights and Choices

You have certain rights regarding your Personal Data, including the ability to:

- 7.1. **Access and Update:** Review, update, or delete your Personal Data through your account settings or by contact us. Correction of Personal Data that is inaccurate or out of date.
- 7.2. **Opt Out of Marketing:** You may opt out of receiving marketing emails by following the unsubscribe instruction in the emails or by contacting us at: nala@arkanala.com.
- 7.3. **Opt Out of Selling or Sharing Information for Targeted Advertising:** You can opt out of data sharing with third-party advertisers and limit tracking technologies as described in our Cookies Policy. Our disclosure of information to these partners may be considered a “sale” or “sharing” of personal information or “targeted advertising” under applicable laws.
- 7.4. **Limit Use of Sensitive Information:** If you provide sensitive Personal Data (e.g., religious views, health data), it will only be used as necessary to provide Services and as described in the sensitive information section above. If you do not want us to process your sensitive information for these purposes, please do not provide it.
- 7.5. **Request Deletion:** Request deletion of Personal Data that its no longer necessary for providing Services or for legal obligations. You can delete your account in your online account settings, or by contacting us for assistance.
- 7.6. **Withdraw Consent:** If you previously provided consent for data processing, you may withdraw it at any time. However, withdrawal does not affect the legality of prior processing.

8. Exercising Your Rights

To exercise your rights, contact us at: nala@arkanala.com. We may request information to confirm your identity before processing your request. Depending on your location, you may be entitled to appoint an authorized agent to act on your behalf. We will ensure compliance with applicable laws in verifying agents’ authority. Some request may be restricted, such as if they impair others rights or our ability to fulfill legal obligations. You are entitled to exercise the rights described above free from discrimination. If you are unsatisfied with our response to your request, you may submit a complaint by emailing us at: nala@arkanala.com. Depending on where you reside, you may have a right to lodge a compliant with your local data protection authority.

9. Right to Object and Erasure

You can object to how we process your Personal Data or request its deletion. Please contact us to make such requests. Personal Data that will be deleted based on applicable legal standards.

10. Links to Other Websites

The Service may contain links to websites that are not operated or controlled by us. When you click on a third party link, you will be directed to that site. We recommend reviewing the privacy policy of each site you visit. We do not control or take responsibility for the content,

privacy policies, or practices of third-party sites. Information you share with these sites will be governed by their privacy policies, and not by this Policy. Our inclusion of links does not imply endorsement or review by us. For information on third party privacy practices, contact the respective third party directly.

11. Use of Arkanala by Minors

The Services are not intended for individuals under 18. If we become aware that a minor under 18 is using our Services, we will block access and delete their account. If you have reason to believe a minor has provided personal information through the Services, please contact us at: nala@arkanala.com, and we will take steps to delete the information.

12. Changes To This Privacy Policy

We may update this Policy from time to time to reflect changes in legal requirements, our practices, or other factors. We reserve the right to modify this Policy at any time, without prior notice. The latest version will be indicated by an updated “Revised” date and will take effect as soon as it is accessible. We encourage you to check this Policy periodically to stay informed of our privacy practices.

13. Supplemental Terms and Conditions Europe (EEA, Switzerland, and UK)

13.1. Legal Basis For Processing Your Information

If you are located in the European Economic Area (the “EEA”), Switzerland, or the United Kingdom (the “UK”), we process your Personal Data only when we believe it is necessary and based on the following legal grounds:

- **Consent:** We collect personal data with your consent.
- **Contract:** We collect data necessary to perform a contract with you.
- **Legitimate Interests:** We may collect data if it serves our legitimate interest, provided it does not override your data protection rights.
- **Legal Obligation:** In some cases, we collect data to comply with legal obligations.

Purpose of processing	Categories of Information	Legal Basis - How we use your information.
To provide and maintain our Services	<ul style="list-style-type: none"> • Account Information • User Content • Communication Information • Log Data • Usage Data • Device Information • Cookies and Similar Technologies 	<p>Contractual necessity</p> <p>Where required to perform a contract, allowing us to provide you access to our services and platforms, including processing user inputs (e.g., prompts) to provide responses.</p>

Purpose of processing	Categories of Information	Legal Basis - How we use your information.
To prevent fraud, criminal activity, or misuse	<ul style="list-style-type: none"> • Account Information • User Content • Communication Information • Social Media Information • Data From Other Sources • Log Data • Usage Data • Device Information • Cookies 	<p>Legitimate interests, Legal obligation Where necessary to comply with legal requirements, and where legitimate interests prevail (e.g., protecting against abuse, fraud, or security risks by processing data from security partners).</p>
To improve and develop services and features	<ul style="list-style-type: none"> • Account Information • Communication Information • Usage Data • Device Information • Cookies and Similar Technologies 	<p>Legitimate interests Necessary for improving and developing new services or features, conducting research, analyzing usage patterns, and enhancing the functionality and user experience on the platform.</p>
To communicate with you	<ul style="list-style-type: none"> • Account Information • Communication Information • Log Data • Usage Data • Device Information • Cookies and Similar Technologies 	<p>Legitimate interests, Contractual necessity Required to manage user communication (e.g., service updates, technical announcements), and where consent is given (e.g., for marketing purposes).</p>
To comply with legal obligations and protect our interest	<ul style="list-style-type: none"> • Account Information • User Content • Communication Information • Log Data • Usage Data • Device Information • Cookies and Similar Technologies 	<p>Legitimate interests, Legal obligation To fulfill legal responsibilities, ensure the protection of users' rights and safety, and comply with regulatory frameworks (e.g., data retention, fraud detection, and abuse prevention).</p>
To enforce agreements, legal claims, and disputes	<ul style="list-style-type: none"> • Account Information • User Content • Communication Information • Data from Other Sources • Log Data • Usage Data • Device Information • Cookies and Similar Technologies 	<p>Legitimate interests, Legal obligation Required for complying with legal obligations (e.g., record-keeping) and protecting our legal rights, including defense against fraud, abuse, and ensuring compliance with terms of service.</p>

We may share your Personal Data with third parties using legal mechanisms such as standard contractual clauses approved by the European Commission, along with additional safeguards when necessary.

13.2. Your Data Protection Rights:

- **Access, Correction, and Deletion:** You can request access to, correction of, or deletion of your Personal Data.

- **Object or Restrict Processing:** You may object to or request restrictions on the processing of your Personal Data.
- **Data Portability:** You can request a copy of your data in a portable format.
- **Withdraw Consent:** If your data is processed with your consent, you may withdraw your consent at any time. Withdraw will not affect the lawfulness of prior processing.

To exercise your rights, visit www.arkanala.com/account or contact us at: nala@arkanala.com. You also have the right to lodge a complaint with your local data protection authority.

14. **California Consumer Privacy Act (CCPA) Notice**

This notice applies solely to California residents and is provided in accordance with the California Consumer Privacy Act of 2018 (CCPA), and the California Privacy Rights Act of 2020 (CPRA). The terms “business,” “business purpose”, “personal information”, “processing”, and “service provider” have the meanings as defined under CCPA and CPRA.

14.1. **Categories of Personal Information We Collect**

Category	Examples of Personal Information	Collected?	Disclosed?
A. Identifiers.	A real name, alias, postal address, contact details, unique personal and device identifier, Internet Protocol (IP) address, email address, social Security number, drivers license number, passport number, or other similar identifiers	YES. A real name, unique personal identifier, online identifier, Internet Protocol address, email address, account name.	
B. Personal Information categories listed in Cal. Civ. Code § 1798.80(e)	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES A name, telephone number, payment information	To Arkanala affiliates and/or service providers.
C. Protected Classifications under California or Federal Law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation,	YES Gender, date of birth	To Arkanala affiliates and/or service providers.

Category	Examples of Personal Information	Collected?	Disclosed?
	veteran or military status, genetic information (including familial genetic information).		
D. Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Not Collected	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	Not Collected	NO
F. Internet or Other Similar Network Activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES Information on a consumer's interaction with a website, application, or advertisement.	To Arkanala affiliates and/or service providers.
G. Geolocation Data	Physical location, approximate location derived from IP address or movements.	YES Approximate location from IP address.	To Arkanala affiliates and/or service providers.
H. Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar information.	Not Collected	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	Not Collected	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	Not Collected	NO

Category	Examples of Personal Information	Collected?	Disclosed?
K. Inferences from other Personal Information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Not Collected	NO
L. Sensitive Personal Information	Government-issued identifying numbers, financial account details, genetic data, precise geolocation, race or ethnicity, religious or philosophical beliefs, union membership, mail, email, text messages, biometric data, health data, and sexual orientation or sex life.	Not Collected	NO

14.2.

14.3. **Selling Information**

Arkanala does not sell your Personal Data, as defined under CCPA. If this changes, we will notify you and provide an opt-out mechanism.

14.4. **Your Rights Under the CCPA/CPRA**

As a California resident, you have the following rights regarding your Personal Data:

14.4.1. **Access to Information.**

You may request details regarding:

- The categories of personal information we have collected
- The source of this information
- The business or commercial purpose for collecting or selling the information
- The third parties with whom we share your information
- The specific data point we have collected about you

14.4.2. **Deletion Rights.**

You may request that we delete your personal information, except where legal exceptions apply.

14.4.3. **Opt-Out of Sale.**

You can opt-out of the sale of your personal information, although we do not currently sell personal data.

14.4.4. **Data Portability.**

You may request your personal information in a portable format for use with other services.

14.5. **Exercising Your Rights.**

To exercise your rights under the CCPA or CPRA, visit www.arkanala.com/account. To verify your request, we may ask for additional information to confirm your identity. You can submit a request on behalf of yourself or your minor child, or authorize an agent to make the request on your behalf.

14.6. **Response Timing and Fees.**

We strive to respond to verified requests within 45 days. If more time is required, we will notify you of the reason for the delay. Any disclosures will cover the 12 months

preceding your request. Responses will be provided via email. We do not charge a fee for fulfilling requests unless they are excessive or repetitive. If applicable, we will provide a cost estimate before processing the request. We will notify you promptly if we determine we must deny your request.

15. **Contact Us**

If you have any questions or concerns about this Privacy Policy, or wish to exercise your rights under the CCPA/CRPA please contact us by emailing customer support at :

Web: <https://arkanala.com/contact>

Email: nala@arkanala.com

In Writing: Digillic INC., 7351 Wiles Road, Suite 103 Coral Springs, Florida, USA 33067