

## **PRIVACY POLICY**

**Last updated March 21, 2023**

This privacy notice for **Braccanal Limited (t/a Braccanal Ltd Promotions )**, "we," "us," or "our"), describes how and why we might collect, store, use, and/or share ("process") your information when you use our services ("Services"), such as when you:

- Visit our website at <https://www.braccanal.com> , or any website of ours that links to this privacy notice
- Download and use our Facebook application (**Braccanal Carnival**), or any other application of ours that links to this privacy notice
- Engage with us in other related ways, including any sales, marketing, or events

**Questions or concerns?** Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at [cybbraccanalcommittee@gmail.com](mailto:cybbraccanalcommittee@gmail.com)

### **SUMMARY OF KEY POINTS**

This summary provides key points from our privacy notice by using our table of contents below to find the section you are looking for.

**What personal information do we process?** When you visit, use, or navigate our Services, we may process personal information depending on how you interact with Braccanal Ltd Promotions and the Services, the choices you make, and the products and features you use.

**Do we process any sensitive personal information?** We may process sensitive personal information when necessary with your consent or as otherwise permitted by applicable law.

**Do we receive any information from third parties?** We do not receive any information from third parties

**How do we process your information?** We process your information to provide improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.

**In what situations and with which parties do we share personal information?**

We personal information is not shared. However, media such as recordings, photographs, videos may be used and shared for marketing and promotional purposes.

**How do we keep your personal information safe?** We have organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers cybercriminals, or other unauthorized third parties will not be able to defeat ours security and improperly collect, access, steal, or modify your information

**What are your rights?** Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

**How do you exercise your rights?** The easiest way to exercise your rights is by filing a data subject request or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws. If you want to learn more about what Braccanal Ltd Promotions does with any information we collect you can email our [here](#) to review the notice in full.

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## **1. WHAT INFORMATION DO WE COLLECT?**

### **Personal information you disclose to us**

In Short: We collect personal information that you provide to us. We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

**Personal Information Provided by You.** The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- names
- phone numbers
- email addresses
- usernames
- passwords
- contact preferences
- contact or authentication data
- billing addresses
- debit/credit card numbers
- job titles
- mailing addresses
- photos & videos

**Sensitive Information.** When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information: financial data, contact data.

**Social Media Login Data.** We may provide you with the option to register with us using your existing social media account details, like your Facebook, Twitter, or other social media account. If you choose to register in this way, we will collect the information described in the section called "HOW DO WE HANDLE YOUR SOCIAL LOGINS?" below:

**Application Data.** If you use our application(s), we also may collect the following information if you choose to provide us with access or permission:

**Mobile Device Data.** We automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our application(s), we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID, and information about the features of our application(s) you accessed.

**Push Notifications.** We may request to send you push notifications regarding your account or certain features of the application(s). If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings. This Information Is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes. All personal information that you provide to us must be true, complete, and accurate and you must notify us of any changes to such personal information.

### **Information automatically collected**

In Short: Some information - such as your Internet Protocol (IP) address and/or browser and device characteristics - Is collected automatically when you visit our Services. 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, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes. The information we collect includes:

**Log and Usage Data.** Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files.

Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called "crash dumps"), and hardware settings).

**Device Data.** We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include Information such as your IP address (or proxy server), device and application identification numbers location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

**Location Data.** We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

**Information collected when you use our Facebook application(s).** We by default access your Facebook basic account information, including your name, email, gender, birthday, current city, and profile picture URL, as well as other information that you choose to make public. We may also request access to other permissions related to your account, such as friends, check-ins, and likes, and you may choose to grant or deny us access to each individual's permission. For more information regarding Facebook permissions, refer to the Facebook Permissions Reference page.

## **2. HOW DO WE PROCESS YOUR INFORMATION?**

In Short: We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

## **3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?**

In Short: We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfill our contractual obligations, to protect your rights, or to fulfill our legitimate business interests.

## **4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?**

In Short: We may share information in specific situations described in this section and/or with the following third parties. We may need to share your personal information in the following situations: financial or business transactions at your request.

## **5. HOW DO WE HANDLE YOUR SOCIAL LOGINS?**

In Short: If you choose to register or log in to our Services using a social media account, we may have access to certain information about you. Our Services offer you the ability to register and log in using your third-party social media account details (like your Facebook or Twitter logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, email address, friends list, and profile picture, as well as other information you choose to make public on such a social media platform. If you log in using Facebook, we may also request access to other permissions related to your account, such as your friends, check-ins, and likes, and you may choose to grant or deny us access to each individual permission. We will use the information we receive only for the purposes that are described in this privacy notice or that are otherwise made clear to you on the relevant Services. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy notice to understand how they collect, use, and share your personal information, and how you can set your privacy preferences on their sites and apps.

## **6. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?**

In Short: We may transfer, store, and process your information in countries other than your own, depending on where our servers are located. If you are accessing our Services from outside, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see "WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?" above), in and other countries. However, we will take all necessary measures to protect your personal information in accordance with this privacy notice and applicable law.

## **7. HOW LONG DO WE KEEP YOUR INFORMATION?**

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law. We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **8. HOW DO WE KEEP YOUR INFORMATION SAFE?**

In Short: We aim to protect your personal information through a system of organizational and technical security measures. We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

## **9. DO WE COLLECT INFORMATION FROM MINORS?**

In Short: We do not knowingly collect data from or market to children under 18 years of age. We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at [cybraccanalcommittee@gmail.com](mailto:cybraccanalcommittee@gmail.com).

## **10. WHAT ARE YOUR PRIVACY RIGHTS?**

In Short: In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below. We will consider and act upon any request in accordance with applicable data protection laws. If you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: <https://www.ombudsman.ky/> If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below. However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent. Opting out of marketing and promotional communications: You can unsubscribe from our marketing and promotional communications at any time by replying "STOP" or "UNSUBSCRIBE" to the SMS messages that we send, Emailing "UNSUBSCRIBE" or by contacting us using the details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below. You will then be removed from the marketing lists. However, we may still communicate with you - for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes. If you have questions or comments about your privacy rights, you may email us at [cybraccanalcommittee@gmail.com](mailto:cybraccanalcommittee@gmail.com)

## **11. CONTROLS FOR DO-NOT-TRACK FEATURES**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## **12. DO WE MAKE UPDATES TO THIS NOTICE?**

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws. We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

## **14. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO)

Shirley Lolita Bodden  
Braccanal Limited,  
Email: [cybraccanalcommittee@gmail.com](mailto:cybraccanalcommittee@gmail.com)  
Attn: Shirley Lolita Bodden  
P.O. Box 130, West End PO  
Cayman Brac KY2-2001

## **15. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?**

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please submit a data subject access request via email to [cybraccanalcommittee@gmail.com](mailto:cybraccanalcommittee@gmail.com)