

ARVO LIMITED

Cookie Policy

Property Investment Crowdfunding Platform

Last Updated: 30 July, 2026

1. Introduction

1.1 Arvo Limited (“Arvo”, “we”, “us” or “our”) is a private company limited by shares incorporated in the Dubai International Financial Centre (“DIFC”) with registration number 12394. Arvo is authorised and regulated by the Dubai Financial Services Authority (“DFSA”) under DFSA reference number F012373 to carry on the Financial Service of Operating a Crowdfunding Platform, specifically Property Investment Crowdfunding, subject to the scope, conditions and restrictions of its DFSA Financial Services Permission.

1.2 Arvo operates the website located at arvo.co and related websites, mobile applications, investor dashboards and digital interfaces made available by Arvo from time to time (together, the “Platform”).

1.3 This Cookie Policy explains how Arvo uses cookies and similar technologies on the Platform, why those technologies are used, how they may collect or otherwise process information about you, and how you can manage your cookie preferences.

1.4 The Platform is designed to support Arvo’s authorised property crowdfunding services, including property browsing, registration, secure account access, KYC/AML onboarding, investment dashboard access, payment flows, investor communications, and related compliance, security and operational functions.

1.5 This Cookie Policy should be read together with Arvo’s Privacy Policy. Where information collected through cookies or similar technologies constitutes Personal Data, it will be processed in accordance with the Privacy Policy and applicable data protection laws, including the DIFC Data Protection Law, DIFC Law No. 5 of 2020, the DIFC Data Protection Regulations, and any other laws that apply to Arvo’s processing activities.

1.6 For the purposes of this Cookie Policy, “Personal Data” means information relating to an identified or identifiable living individual, including where such individual can be identified directly or indirectly from online identifiers, device identifiers, IP addresses, account identifiers, or other information collected through the Platform.

1.7 The Platform is not directed at individuals under 18 years of age. Arvo does not knowingly offer the Platform to minors and does not knowingly set non-essential cookies on, or collect cookie-derived Personal Data from, devices or accounts known by Arvo to be used by individuals under 18. If Arvo becomes aware that cookie-derived Personal Data has been collected from an individual under 18 without appropriate authority, Arvo will take reasonable steps to delete, disable or de-identify such data, unless retention is required by applicable law, regulatory obligations, security requirements, audit requirements or financial crime prevention obligations.

2. What Are Cookies And Similar Technologies?

2.1 Cookies are small text files that are placed on your browser, computer, mobile device or other electronic device when you visit a website or use an online service. Cookies allow the website or service to recognise your device, remember certain information about your visit, and support the functionality of the service.

2.2 Cookies may be “session cookies”, which are deleted when you close your browser, or “persistent cookies”, which remain on your device for a specified period unless deleted earlier. Cookies may also be “first-party cookies”, which are set by Arvo, or “third-party cookies”, which are set by service providers or other third parties whose technologies are integrated into the Platform.

2.3 Similar technologies include software development kits, pixels, tags, web beacons, local storage, mobile identifiers, device fingerprinting tools, embedded scripts and server-side logs. In this Cookie Policy, references to “cookies” include these similar technologies where the context permits.

2.4 Cookies do not normally identify you by name on their own. However, cookies may collect or generate information that can identify you when combined with other information held by Arvo, such as account registration data, investor onboarding information, contact details, KYC status, transaction history or Platform usage records.

3. Information Collected Through Cookies

3.1 Depending on your use of the Platform and your cookie preferences, cookies and similar technologies may collect or generate the following categories of information:

- (a) technical information, including IP address, browser type, browser version, operating system, device type, device identifier, screen resolution, time zone setting, language settings and network information;
- (b) usage information, including pages viewed, time spent on the Platform, clickstream data, referral source, exit pages, search queries, error messages, login events, transaction journey steps, and investor dashboard interactions;
- (c) security and compliance information, including authentication status, session identifiers, device risk signals, fraud-prevention signals, failed login attempts, suspicious activity indicators and other information used to protect the Platform;
- (d) preference information, including language, currency, country, cookie choices, display preferences, saved settings and other choices you make when using the Platform;
- (e) marketing and analytics information, including campaign source, referral information, advertising identifiers and aggregated statistics about Platform engagement, where non-essential cookies have been accepted; and
- (f) onboarding and transaction journey information, including information required to maintain continuity during KYC/AML, payment, account funding, document signing or other Platform workflows.

3.2 Arvo does not use cookies to store your passwords, card security codes, identification documents, complete payment credentials or complete KYC files. Where identity documents, biometric checks, proof of address documents, payment details or other regulated onboarding information are collected through the Platform or through an integrated third-party provider, those activities are governed by Arvo’s Privacy Policy, onboarding disclosures, applicable provider terms and Arvo’s regulatory compliance procedures.

4. Why We Use Cookies

4.1 Arvo uses cookies and similar technologies for the following purposes:

- (a) to make the Platform work, including page loading, secure login, account authentication, investor dashboard access, session continuity, payment redirection and cookie-preference management;
- (b) to protect users, investors, prospective investors and Arvo, including by detecting unauthorised access, fraud, abuse, suspicious activity, malware, denial-of-service attacks and other security threats;
- (c) to support regulatory and compliance controls, including KYC/AML onboarding, sanctions screening workflows, audit trails, investor classification, suitability processes, transaction monitoring and recordkeeping;
- (d) to remember choices and preferences, including language, region, display settings, saved forms, dashboard settings and other preferences you select;
- (e) to understand and improve Platform performance, including by measuring traffic, identifying technical issues, assessing user journeys, improving the registration process and maintaining the stability of the Platform;
- (f) to provide content and functionality relevant to your use of the Platform, including property information, education pages, FAQs, investment memoranda access controls, investor communications and dashboard features;
- (g) to measure marketing and referral activity, where applicable and where required consent has been obtained; and
- (h) to comply with legal, regulatory, supervisory, dispute-resolution and audit obligations applicable to Arvo.

4.2 Arvo will not use cookies to provide personalised investment advice. Any property information, education content, performance information, market analysis, investment memoranda or Platform communications made available through the Platform are provided subject to Arvo's applicable client-facing terms and regulatory disclosures.

5. Types Of Cookies And Similar Technologies We Use

5.1 Strictly Necessary Cookies

5.1.1 Strictly necessary cookies are required for the Platform to operate and cannot be switched off through Arvo's cookie preference centre. These cookies are used for core Platform functionality, including page navigation, secure login, session management, load balancing, system availability, consent records and transaction journey continuity.

5.1.2 Without strictly necessary cookies, the Platform may not be able to provide the services you request, including registration, secure dashboard access, KYC/AML onboarding, account funding, document access, investor communications or property subscription workflows.

5.2 Authentication And Security Cookies

5.2.1 Authentication and security cookies are used to authenticate users, protect accounts, apply access controls, identify suspicious activity, prevent misuse of the Platform and maintain appropriate security logs and audit trails.

5.2.2 These cookies may support multi-factor authentication, device recognition, fraud-prevention signals, failed login monitoring, session protection and other controls required to keep the Platform

secure. Some authentication and security cookies are strictly necessary where they are required to protect user accounts, secure the Platform or comply with legal or regulatory obligations.

5.3 Functional Cookies

5.3.1 Functional cookies allow the Platform to remember choices that you make and provide enhanced functionality. These may include remembering language, region, currency display, saved dashboard settings, accessibility settings, form progress, preferred communication choices and other non-essential preferences.

5.3.2 Functional cookies improve user experience but are not always essential to the provision of the Platform. Where required by applicable law, Arvo will seek your consent before setting functional cookies that are not strictly necessary.

5.4 KYC/AML And Compliance Cookies And Technologies

5.4.1 KYC/AML and compliance cookies and technologies support onboarding, identity verification, sanctions screening, liveness checks, risk scoring, investor classification, compliance reviews, audit trails, recordkeeping and ongoing monitoring workflows.

5.4.2 These cookies and technologies may be set by Arvo or by third-party KYC, AML, identity verification, compliance, fraud-prevention or onboarding providers integrated into the Platform. Some may be necessary to provide onboarding services, comply with legal or regulatory obligations, preserve audit trails or prevent financial crime. Non-essential analytics relating to these flows may be subject to consent where required by applicable law.

5.5 Payment And Transaction Cookies

5.5.1 Payment and transaction cookies may be used to maintain the continuity, security and integrity of payment, account-funding, investment commitment, subscription, exit, refund, reconciliation or related transaction flows on the Platform.

5.5.2 Payment-related cookies may be set by Arvo or by third-party payment service providers, open banking providers, card processors, banking partners or other approved transaction infrastructure providers integrated into the Platform from time to time. These cookies may be necessary to complete the transaction requested by you.

5.6 Performance And Analytics Cookies

5.6.1 Performance and analytics cookies help Arvo understand how users interact with the Platform, including which pages are visited most often, whether users encounter error messages, how onboarding and dashboard flows perform, and whether particular Platform features require improvement.

5.6.2 The information collected through performance and analytics cookies is generally used in aggregated form. Where such cookies collect Personal Data or online identifiers, Arvo will process such information in accordance with its Privacy Policy and applicable law. Performance and analytics cookies are managed through the consent mechanism described in Section 7, and you may disable them at any time through the “Cookie Settings” preference centre.

5.7 Marketing, Referral And Advertising Cookies

5.7.1 Marketing, referral and advertising cookies may be used to measure the effectiveness of marketing campaigns, understand how users reach the Platform, administer referral programmes, measure engagement with promotional content and deliver relevant communications, where such activities are enabled by Arvo.

5.7.2 Marketing, referral and advertising cookies are managed through the consent mechanism described in Section 7. You may reject them using the cookie banner, or withdraw your consent at any time through the “Cookie Settings” preference centre or your browser settings.

5.8 Embedded Content And Third-Party Interaction Cookies

5.8.1 Embedded content and third-party interaction cookies may be used where the Platform displays or supports embedded content, external sign-in, maps, videos, social media links, document signing tools, customer support tools or other third-party functionality.

5.8.2 These cookies may be set by the relevant third-party provider and may be subject to that provider’s own privacy notice, cookie policy and terms of use. Where embedded content or third-party interaction cookies are not strictly necessary, Arvo will seek consent where required by applicable law before enabling them.

6. Third-Party Cookies And Service Providers

6.1 Arvo may integrate technologies provided by third-party service providers to operate, secure and improve the Platform. Such providers may place or access cookies or similar technologies on your device when you use the Platform or when you interact with their services through the Platform.

6.2 Third-party technologies may include technologies used for hosting, security, authentication, KYC/AML, payment processing, open banking, document signing, CRM workflows, customer communications, analytics, engagement tracking, property data integration and regulatory recordkeeping.

6.3 Examples of third-party providers or technologies that may be relevant to the Platform include AWS, Vercel, Cloudflare, Supabase, Sumsb, Tap Payments, Postmark, Google, Meta, Customer.io and other providers appointed by Arvo from time to time. This list is illustrative and may be updated periodically to reflect Arvo’s live technology stack, vendor arrangements and cookie scan results.

6.4 Third-party cookies are controlled by the relevant third party, not by Arvo. Arvo will take reasonable steps to conduct appropriate due diligence on material service providers and to require contractual protections where such providers process Personal Data on Arvo’s behalf. However, third-party websites, plug-ins, SDKs and services may also be subject to their own privacy notices, cookie policies and terms of use.

6.5 Where the Platform links to external websites or embeds third-party content, those external websites and providers may place their own cookies. Arvo is not responsible for the cookie practices of third-party websites or services that are not controlled by Arvo.

7. Cookie Consent And Preference Management

7.1 When you first visit the Platform, Arvo displays a cookie banner that explains Arvo’s use of cookies and offers “Accept”, “Reject” and “Settings” options for analytics and marketing cookies. Strictly necessary cookies run automatically and are not affected by these options.

7.2 Arvo may use strictly necessary cookies without seeking consent where they are required to provide the Platform, comply with legal obligations, maintain security, record your cookie choices or provide a service requested by you.

7.3 Analytics and marketing cookies and similar technologies (including those provided through Google Tag Manager, Google Analytics, Google Ads, the Meta Pixel and Customer.io) may be in use from the time you access the Platform, in accordance with your cookie preferences. If you do not make a selection in the cookie banner but continue to use the Platform without disabling cookies, Arvo will treat your continued use as your acceptance of analytics and marketing cookies. For any other non-essential cookies and similar technologies, including functional, embedded content and third-party interaction cookies, and any non-essential authentication, security, KYC/AML, compliance, payment or transaction cookies, Arvo will request your consent before placing them on your device where required by applicable law. Arvo will record your cookie choices for compliance and audit purposes.

7.4 If you select “Reject” in the cookie banner, analytics and marketing tracking on the Platform is disabled and the page reloads to apply your choice. You may withdraw or change your consent at any time by using the “Cookie Settings” preference centre available on the Platform or by adjusting your browser or device settings. Withdrawing consent will not affect the lawfulness of processing based on consent before the withdrawal.

7.5 If you use different devices or browsers to access the Platform, you may need to update your cookie preferences separately on each device or browser.

8. How To Manage Cookies

8.1 You can control cookies in the following ways:

- (a) use Arvo’s “Cookie Settings” preference centre to accept, reject or manage non-essential cookie categories;
- (b) change your browser settings to block, delete or notify you about cookies;
- (c) use the privacy or tracking settings available on your mobile device or operating system;
- (d) use any opt-out settings made available by third-party analytics or advertising providers; and
- (e) clear cookies from your browser history if you wish to remove cookies already stored on your device.

8.2 Most browsers allow you to refuse cookies, delete cookies, or receive a warning before a cookie is stored. The precise settings depend on the browser and device you use. You should consult the “Help”, “Settings” or “Privacy” section of your browser for further information.

8.3 If you block or delete cookies, some features of the Platform may not operate properly. In particular, you may be unable to register, log in securely, complete KYC/AML checks, access your investor dashboard, complete payment flows, view documents, maintain session continuity or use Platform functionality required for Arvo’s authorised services.

8.4 Some browsers provide “Do Not Track” or similar signals. Because there is no consistent industry standard for responding to such signals, Arvo may not respond to “Do Not Track” signals unless required by applicable law. You can use the cookie preference centre and browser controls described above to manage your choices.

9. Cookies In The Mobile Application

9.1 Where Arvo makes a mobile application available, the application may use cookies, SDKs, device identifiers, local storage, push notification identifiers, analytics tools and other mobile

technologies to provide functionality similar to the website, including login, security, onboarding, account access, transaction journeys, notifications and performance monitoring.

9.2 You may manage certain mobile tracking or notification settings through your device settings. However, disabling certain mobile identifiers or permissions may affect the functionality, security and usability of the mobile application.

10. International Transfers And Data Sharing

10.1 Some cookies and similar technologies may involve the transfer of Personal Data to service providers located outside the DIFC or outside the United Arab Emirates. Such transfers may occur where Arvo uses global technology providers, hosting providers, analytics providers, payment providers, identity-verification providers, cloud infrastructure providers or other service providers.

10.2 Where Arvo transfers Personal Data outside the DIFC, Arvo will take steps required by applicable data protection law, including assessing the destination jurisdiction, implementing appropriate contractual safeguards and maintaining records of processing and transfer arrangements, where required.

10.3 Further information about how Arvo shares Personal Data and transfers Personal Data internationally is set out in Arvo's Privacy Policy.

11. Cookie Retention

11.1 Cookies remain on your device for different periods depending on their purpose. Session cookies are deleted when you close your browser. Persistent cookies remain until they expire or are deleted by you.

11.2 Arvo will not retain cookie-derived Personal Data for longer than necessary for the purposes described in this Cookie Policy, the Privacy Policy or any other applicable client-facing disclosure, unless a longer retention period is required for legal, regulatory, accounting, audit, dispute-resolution, fraud-prevention, financial crime, cybersecurity or recordkeeping purposes.

11.3 Arvo will review its cookie inventory periodically and update its cookie schedule where material changes are made to the Platform, its technology stack, its third-party service providers or its data processing activities.

12. Updates To This Cookie Policy

12.1 Arvo may update this Cookie Policy from time to time to reflect changes in the Platform, applicable law, regulatory expectations, technology providers, cookie practices, data protection processes or business operations.

12.2 Where changes are material, Arvo may provide notice through the Platform, by email, through the cookie banner or by other appropriate means. The "Last Updated" date at the beginning of this Cookie Policy indicates when this Cookie Policy was last revised.

13. Contact Us

13.1 If you have any questions about this Cookie Policy or Arvo's use of cookies and similar technologies, please contact Arvo at:

Entity	Arvo Limited
Regulatory Status	Authorised and regulated by the DFSA under DFSA reference number F012373

Address	Unit GD-PB-04-01-OF-01-0, Level 1, DIFC Funds Centre, Precinct Building 4, Dubai International Financial Centre
Email	compliance@arvo.co
Data Protection Contact	compliance@arvo.co

13.2 If you wish to exercise your data protection rights or make a privacy-related request, please refer to Arvo's Privacy Policy for further information about the relevant process, rights and limitations.

Schedule 1 - Cookie Schedule

The table below provides a summary of the categories of cookies and similar technologies that Arvo may use on the Platform. The precise cookie names, providers, expiry periods and descriptions should be maintained through Arvo's cookie preference centre and updated periodically based on technical cookie scans, vendor changes, Platform changes and applicable legal or regulatory requirements.

Part A – Categories of Cookies and Similar Technologies

Category	Purpose	Example Technologies / Providers	Consent Approach	Typical Duration
Strictly Necessary Cookies	To operate the Platform, maintain session continuity, enable secure login, route traffic, prevent fraud, remember cookie choices and support essential transaction flows.	Internal Arvo cookies, Supabase, Cloudflare, AWS, Vercel, consent-management tool.	Consent is generally not required where the cookie is strictly necessary to provide the service requested by the user or to secure the Platform.	Session to 12 months, depending on function.
Authentication And Security Cookies	To authenticate users, protect accounts, identify suspicious activity, apply access controls, prevent abuse and maintain audit trails.	Keycloak, Cloudflare, AWS security services, device risk and fraud-prevention tooling.	Often strictly necessary where used for security and account protection. Non-essential risk or analytics features may require consent.	Session to 24 months, depending on risk and audit requirements.
Functional Cookies	To remember user choices such as language, country, currency display, dashboard settings, form progress and accessibility preferences.	Internal Arvo preference cookies, mobile app storage, dashboard settings.	Consent may be required where the cookie is not essential to the requested service.	30 days to 24 months.
KYC/AML And Compliance Cookies And Technologies	To maintain continuity during onboarding, identity verification, sanctions screening, liveness checks, risk scoring, compliance reviews and ongoing	Sumsb, onboarding workflow tools, compliance audit logs.	Some may be necessary to provide onboarding and comply with legal/regulatory obligations. Non-essential analytics around these flows should be subject to consent where required.	Session to 24 months for cookies or local technologies, depending on function. Related compliance, audit and regulatory records may be retained separately in accordance with Arvo's Privacy Policy, AML

	monitoring workflows.			obligations and recordkeeping requirements.
Payment And Transaction Cookies	To support payment redirection, card payments, account-to-account transfers, account funding, refunds, transaction security, fraud prevention and reconciliation.	Tap Payments, banking partners, payment service providers, card processors, open banking providers and other approved transaction providers.	Generally necessary where used to complete a requested transaction or secure payment flow. Non-essential analytics may require consent.	Session to 24 months, depending on provider and transaction purpose.
Performance And Analytics Cookies	To understand Platform usage, measure reliability, identify errors, assess user journeys, improve onboarding and monitor feature performance.	Google Analytics 4 (including first-party Google identifiers), Google Tag Manager, Customer.io, Firebase, performance-monitoring tools, aggregated analytics, error logs.	Consent required where these cookies are not strictly necessary and where applicable law requires consent.	Session to 24 months.
Marketing, Referral And Advertising Cookies	To understand campaign performance, administer referral programmes, measure engagement and deliver or assess promotional communications.	Google Ads, Meta Pixel, referral tracking, campaign analytics, advertising pixels and social media integrations, where enabled.	Consent required where applicable. Users must be able to withdraw consent.	30 days to 24 months.
Embedded Content And Third-Party Interaction Cookies	To display or support embedded content, external sign-in, maps, videos, social media links, document signing and related third-party functions.	Apple, Google, social media platforms and other embedded providers, where enabled.	Depends on the purpose. Non-essential embedded third-party cookies should be disabled until consent is obtained where required.	Set by the relevant third party; varies by provider.

Part B – Specific Cookies Identified on the Platform

The cookies listed below were identified through a technical cookie scan of the Platform. Each of these cookies is written on the arvo.co domain and is therefore treated by your browser as a first-party cookie, although certain of the underlying scripts are provided by Google, Meta and Customer.io. This list will be updated periodically to reflect changes to the Platform, its technology stack and future cookie scan results.

Cookie	Provider	Category	Purpose	Duration
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arvo_cookie_preferences	Arvo	Strictly necessary	Stores your cookie-consent choice so the cookie banner is not shown again.	1 year
_ga	Google Analytics	Performance and analytics	Distinguishes unique visitors using a randomly generated client ID.	2 years
_ga_8XSCCS1VNF	Google Analytics 4	Performance and analytics	Maintains session state for the Google Analytics 4 property used on the Platform.	2 years
FPID	Google (first-party)	Performance and analytics	Server-set identifier used to recognise returning visitors.	Up to 2 years
FPLC	Google (first-party linker)	Performance and analytics	Hashed identifier linking arvo.co and metrics.arvo.co.	Approximately 20 days
_gtmceec	Google Tag Manager	Performance and analytics	Encoded enhanced-conversions and consent data passed to tags.	Session
ajs_anonymous_id	Customer.io	Performance and analytics	Anonymous visitor identifier used to link pre-signup activity to an account once created.	1 year
ajs_user_id	Customer.io	Performance and analytics	Identifier for a known user once identified (for example, by email address).	1 year
_gcl_au	Google Ads	Marketing, referral and advertising	Stores ad-click information used for conversion attribution.	90 days
_fbp	Meta Pixel	Marketing, referral and advertising	Browser identifier used for advertising delivery and measurement.	90 days

Part C – Third-Party Cookies

The following cookies are set on the facebook.com domain in connection with the Meta Pixel used on the Platform, where marketing cookies have been enabled.

Cookie	Set By	Purpose	Duration
fr	Meta (facebook.com)	Encrypted identifier combining Facebook and browser information, used by Meta for advertising delivery and measurement. This cookie is set as a result of the Meta Pixel operating on the Platform and is disclosed under the marketing, referral and advertising category.	90 days
datr, sb	Meta (facebook.com)	Security and browser-identification cookies set by Meta for all browsers that come into contact with facebook.com. These cookies are controlled by Meta and are subject to Meta's own cookie policy.	Approximately 2 years

Where your browser is signed in to Facebook, Meta may also set account and session cookies on the facebook.com domain (such as c_user, xs, presence, locale, wd and dpr). These cookies result from your own relationship with Meta rather than from your use of the Platform, are controlled by Meta and are governed by Meta's own cookie policy.

Schedule 2 - Cookie Banner Text

The following sample cookie banner language may be used or adapted in the Platform's consent-management tool.

Short Cookie Banner

We use cookies and similar technologies to operate and secure our Platform, remember your preferences, analyse Platform performance and, where you consent, support marketing and referral activities. You can select "Accept", "Reject" or "Settings" to manage analytics and marketing cookies. If you continue to use the Platform without making a selection, we will treat this as your acceptance of these cookies. You can change your choice at any time through Cookie Settings. For more information, please read our Cookie Policy and Privacy Policy.

Cookie Preference Centre Summary

S2.1 Strictly necessary cookies are always active because they are required for the Platform to work securely and to provide services requested by you.

S2.2 Authentication and security cookies help us authenticate users, protect accounts, prevent misuse of the Platform and maintain security logs. Some of these cookies are strictly necessary, while others may be subject to consent where required by applicable law.

S2.3 Functional cookies help us remember your choices and improve your experience.

S2.4 KYC/AML and compliance cookies and technologies help us support onboarding, identity verification, sanctions screening, compliance checks, audit trails and related regulatory workflows. Some of these cookies and technologies may be necessary for legal, regulatory, security or financial crime prevention purposes.

S2.5 Payment and transaction cookies help us support payment redirection, account funding, refunds, reconciliation and other transaction flows. Some of these cookies may be necessary to complete a transaction requested by you.

S2.6 Performance and analytics cookies help us understand how the Platform is used and improve reliability, usability and performance.

S2.7 Marketing, referral and advertising cookies help us measure campaigns and referral activity and deliver relevant communications where enabled.

S2.8 Embedded content and third-party interaction cookies help us support embedded content, external sign-in, maps, videos, document signing, customer support tools or other third-party functionality where enabled.

S2.9 You can change your preferences at any time through the cookie preference centre.